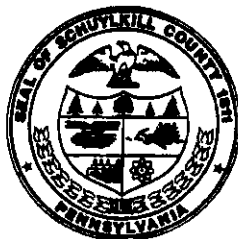


**COUNTY OF SCHUYLKILL**  
**OFFICE OF THE PROTHONOTARY**

DAVID J. DUTCAVICH, PROTHONOTARY  
DEBORAH A. CONWAY, SECOND DEPUTY  
ERIC PROCK, SOLICITOR



401 North Second Street  
Pottsville, PA 17901-2520  
E-Mail: prothy@schuylkill.us  
Telephone: 570-628-1270  
In Schuylkill County: 668-5944 Ext. 1270  
695-2156 Ext. 1270  
874-4058 Ext. 1270  
Facsimile: 570-628-1261

APRIL 5, 2018

18 cv 361

**FILED**  
**SCRANTON**

APR - 9 2018

PER

  
DEPUTY CLERK

US DISTRICT COURT  
MIDDLE DISTRICT OF PA  
PO BOX 1148  
SCRANTON, PA 1501

IN RE; NOTICE OF REMOVAL TURNER VS WETZEL ET AL S-89-2018

DEAR SIR:

PLEASE FIND ENCLOSED ALL RECORD PAPERS AND CERTIFIED DOCKET ENTRIES FOR THE ABOVE MENTIONED CASE. BY NOTICE OF REMOVAL I'M THEREFORE, FORWARDING SAID CASE TO YOUR COURT FOR FILING.

IF ANYTHING FURTHER IS REQUIRED PLEASE CONTACT OUR OFFICE. THANKING YOU FOR YOUR IMMEDIATE ATTENTION TO THIS MATTER.

YOURS IN PUBLIC SERVICE

DAVID J. DUTCAVICH,  
PROTHONOTARY

ENCL

DOCKET: S-89-2018  
COMPLAINT IN CIVIL ACTION LAW

FILED: 01/19/2018 at 11:10AM

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PLAINTIFFS

---

DEFENDANTS

---

TURNER, WILLIAM D  
AM5992  
SCI FRACKVILLE  
1111 ALTAMOUNT BLVD  
FRACKVILLE, PA 17932

---

WETZEL, JOHN E  
SECRETARY OF CORRECTIONS  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG, PA 17050

---

KELDIE, CARL  
CORRECTION CARE SOLUTION  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG, PA 17050

---

SILVA, JOSEP  
CORRECTION CARE SOLUTION  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG, PA 17050

---

NOAL, PAUL DR.  
DEPT OF CORRECTION HEALTH CARE  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG, PA 17050

---

COWAN, JAY DR.  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG, PA 17050

---

KUREN, MA DR.  
SCI FRACKVILLE  
1111 ALTAMONT BLVD  
FRACKVILLE, PA 17932

---

KURAS, VISOR  
SCI FRACKVILLE  
1111 ALTAMONT BLVD  
FRACKVILLE, PA 17932

---

CHDA, HOLLY  
SCI FRACKVILLE  
1111 ALTAMONT BLVD  
FRACKVILLE, PA 17932

---

SELBI RN, SHARON  
SCI FRACKVILLE  
1111 ALTAMONT BLVD  
FRACKVILLE, PA 17932

---

DOE, JOHN  
PA

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DOE, JANE  
PA

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FILING

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DOCKET: S-89-2018  
COMPLAINT IN CIVIL ACTION LAW

FILED: 01/19/2018 at 11:10AM

---

FILING

---

APPLICATION TO PROCEED IN FORMA PAUPERIS  
01/19/2018 at 11:10AM  
TURNER, WILLIAM D

---

T & E  
01/19/2018 at 11:11AM  
PLAINTIFFS

---

STATE TAX (.50)  
01/19/2018 at 11:11AM  
PLAINTIFFS

---

COMPUTER FUND  
01/19/2018 at 11:11AM  
PLAINTIFFS

---

AUTOMATION FUND  
01/19/2018 at 11:11AM  
PLAINTIFFS

---

CERTIFICATE OF MERIT  
01/23/2018 at 09:42AM  
TURNER, WILLIAM D

---

PRAECIPE  
01/25/2018 at 10:30AM  
TURNER, WILLIAM D

---

ORDER OF COURT/COPIES MAILED  
01/26/2018 at 01:30PM  
RUSSELL, JACQUELINE L

---

ORDER GRANTING IN FORMA PAUPERIS  
01/26/2018 at 01:30PM  
RUSSELL, JACQUELINE L

---

SHERIFF'S SERVICE-SEE FILE  
02/01/2018 at 01:36PM  
SHF 75.80

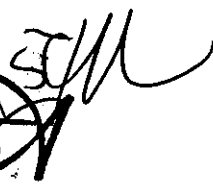
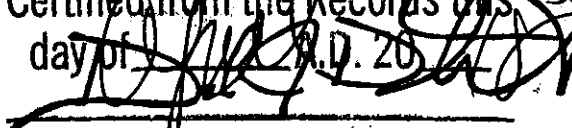
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NOTICE OF REMOVAL  
02/16/2018 at 10:45AM  
FOREMAN, SAMUEL H

---

CERTIFICATE OF SERVICE  
02/16/2018 at 10:45AM  
FOREMAN, SAMUEL H

---

Certified from the Records this  
day of February 2018   
  
Prothonotary of Schuylkill  
**PROTHONOTARY**  
My Commission Expires  
First Monday of January 2020

DOCKET: S-89-2018  
COMPLAINT IN CIVIL ACTION LAW

FILED: 01/19/2018 at 11:10AM

SHERIFF SERVICES		
SERVICE ID	DATE	TYPE OF SERVICE
91234	01/26/2018	CIVIL ACTION
Type of Return:		
Attempt: 1	SERVING	01/30/2018 08:03:00
Address: 1111 ALTAMONT BLVD	FRACKVILLE	
Def: DR. MA KUREN		Served: JEN NEWBERRY
Def: VISOR KURAS		Served: JEN NEWBERRY
Def: HOLLY CHDA		Served: JEN NEWBERRY
Def: SHARON SELBI RN		Served: JEN NEWBERRY
Attempt: 2	SERVING	02/05/2018 11:33:00
Address: 1920 TECHNOLOGY PARKWAY	MECHANICSBURG	
Def: JOHN E WETZEL		Served: DEB BRYAN
Def: CARL KELDIE		Served: DIANE HINKLE
Def: JOSEP SILVA		Served: DEB BRYAN
Def: DR. PAUL NOAL		Served: DEB BRYAN
Def: DR. JAY COWAN		Served: DEB BRYAN

4

IN THE COURT OF COMMON PLEAS OF SCHUYLKILL COUNTY

WILLIAM D. TURNER,

Plaintiff,

v.

JOHN E. WETZEL, SECRETARY OF  
CORRECTIONS; CORRECTION CARE  
SOLUTION, CARL KELDIE, JOSEP SILVA  
(DEPARTMENT OF CORRECTIONS  
HEALTH CARE SERVICE DIRECTOR),  
DR. PAUL NOAL, DR. JAY COWAN, THE  
DOC'S HEPATITIS C COMMITTEE, SCI  
FRACKVILLE'S MA KUREN, VISOR MS.  
KURAS, CHDA MS. HOLLY and SHARON  
SELBI; RN any and all individuals or entities  
responsible for my HEALTH CARE and/or  
DOC MEDICAL POLICIES,

Defendant.

CIVIL DIVISION

Case No.: S-89-18

**NOTICE OF FILING NOTICE OF  
REMOVAL TO UNITED STATES  
DISTRICT COURT**

Filed on behalf of Defendants

Jay Cowan

Carl Keldie

Counsel of Record for this Party

Samuel H. Foreman

PA I.D. 77096

WEBER GALLAGHER SIMPSON

STAPLETON FIRES & NEWBY LLP

Firm #594

Four PPG Place

5<sup>th</sup> Floor

Pittsburgh, PA 15222

Phone: (412) 281-4541

Fax: (412) 281-4547

IN THE COURT OF COMMON PLEAS OF SCHUYLKILL COUNTY

WILLIAM D. TURNER,

Plaintiff,

v.

JOHN E. WETZEL, SECRETARY OF  
CORRECTIONS; CORRECTION CARE  
SOLUTION, CARL KELDIE, JOSEP SILVA  
(DEPARTMENT OF CORRECTIONS  
HEALTH CARE SERVICE DIRECTOR),  
DR. PAUL NOAL, DR. JAY COWAN, THE  
DOC'S HEPATITIS C COMMITTEE, SCI  
FRACKVILLE'S MA KUREN, VISOR MS.  
KURAS, CHDA MS. HOLLY and SHARON  
SELBI; RN any and all individuals or entities  
responsible for my HEALTH CARE and/or  
DOC MEDICAL POLICIES,

Defendant.

:  
:  
: CIVIL DIVISION  
:  
: Case No.: S-89-18  
:  
:  
:  
:  
:

RECEIVED  
SCHUYLKILL COUNTY  
JAN 13 2018

**NOTICE OF FILING NOTICE OF REMOVAL  
TO UNITED STATES DISTRICT COURT**

PLEASE TAKE NOTICE that the undersigned have, on this date, filed a Notice for Removal of this action in the United States District Court, Middle District of Pennsylvania. A true and correct copy of the Notice of Removal is attached and served with this notice.

Respectfully submitted,

**WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY, LLP**

By: 

Samuel H. Foreman, Esquire  
Meghan K. Adkins, Esquire  
Attorney for Defendants  
Jay Cowan and Carl Keldie

Date: February 13, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **NOTICE OF FILING NOTICE OF REMOVAL TO UNITED STATES DISTRICT COURT** was served via United States mail, first class, postage prepaid, this 13th day of February, 2018, on the following:

William D. Turner, AM5992  
SCI-Frackville  
1111 Altamont Blvd  
Frackville, PA 17932

Daniel J. Gallagher  
Deputy Attorney General  
Office of the Attorney General  
Civil Litigation Section  
15th Fl., Strawberry Square  
Harrisburg, PA 17120

RECEIVED  
U.S. DISTRICT COURT  
HARRISBURG, PA  
FEB 14 2018

WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY LLP

BY: \_\_\_\_\_



Samuel H. Foreman  
Meghan K. Adkin  
Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

WILIAM D. TURNER,

Plaintiff,

vs.

***FILED ELECTRONICALLY***

CIV. ACTION NO.

JOHN E. WETZEL, SECRETARY OF  
CORRECTIONS; CORRECTION  
CARE SOLUTION, CARL KELDIE,  
JOSEP SILVA (DEPARTMENT OF  
CORRECTIONS HEALTH CARE  
SERVICE DIRECTOR), DR. PAUL  
NOAL, DR. JAY COWAN, THE  
DOC'S HEPATITIS C COMMITTEE,  
SCI FRACKVILLE'S MA KUREN,  
VISOR MS. KURAS, CHDA MS.  
HOLLY and SHARON SELBI; RN any  
and all individuals or entities  
responsible for my HEALTH CARE  
and/or DOC MEDICAL POLICIES,

Defendants.

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §1331, §1441 and §1446, Petitioners, Carl Keldie and Dr. Jay Cowan, petition this Court to remove this action from the Court of Common Pleas of Schuylkill County, Pennsylvania, to the United States District Court for the Middle District of Pennsylvania and in support thereof aver as follows:

FILED  
APR 10 2018  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA  
PHILADELPHIA



### **State Court Action**

1. This action for removal is currently before the Court of Common Pleas of Schuylkill County, Pennsylvania, styled as William D. Turner v. John E. Wetzel, et al., Case No. S-89-18

2. Plaintiff initiated the instant civil rights lawsuit *pro se* on January 19, 2018 with the filing of his Complaint.

### **Parties**

3. Plaintiff in this case is William D. Turner, an inmate currently incarcerated within the Pennsylvania Department of Corrections at State Correctional Institution at Frackville (“S.C.I.-Frackville”) under inmate number AM-5992.

4. Defendants, Carl Keldie and Dr. Jay Cowan, are alleged to have been involved in and/or responsible for healthcare services provided to inmates incarcerated at S.C.I.-Rockview. Defendants have not been properly served with the Complaint, however the undersigned Counsel intends to accept the Complaint on Defendants’ behalf. Defendants first became aware of the Complaint on or about February 9, 2018.

5. Plaintiff's Complaint, filed in the Court of Common Pleas of Schuylkill County, Pennsylvania, on January 19, 2018 is attached hereto as Exhibit "A".

6. Plaintiff asserts that the instant matter is a civil rights action pursuant to 42 U.S.C. § 1983 for violations of his rights under the Eighth Amendments to the United States Constitution. (See Plaintiff's Complaint, ¶ 21, 22)

7. Plaintiff's lawsuit asserts deliberate indifference relating to the alleged refusal of treatment for Hepatitis-C and symptoms allegedly arising therefrom.

8. This Court has original jurisdiction of this matter under federal question jurisdiction, pursuant to 28 U.S.C. §§ 1331, because Plaintiff's claims arise under the Constitution and laws of the United States. See 28 U.S.C. §1331.

9. As such, pursuant to 28 U.S.C. § 1441(a), the instant action is removable to this Court on the basis of federal question jurisdiction, because "any civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending." See 28 U.S.C. § 1441(a).

10. This Notice of Removal is timely filed with this Court.

11. In accordance with 28 U.S.C. §1446(a), all of the process and substantive pleadings filed in the action to date, along with a copy of the Civil Docket Sheet, are collectively attached to this notice as Exhibit "B".

12. As required by 28 U.S.C. §1446(d), Defendants have filed a true and correct copy of this Notice of Removal with the Clerk of the Court of Common Pleas of Schuylkill County, Pennsylvania. (A copy of the Notice of Filing the Notice of Removal is attached hereto as Exhibit "C").

13. This Notice of Removal is being filed in the United States District for the Middle District of Pennsylvania, the District Court of the United States within which the state court action is pending, as required by 28 U.S.C. §§1441(a) and 1446(a).

14. Accordingly, Defendants have satisfied all procedural requirements governing removal pursuant to 28 U.S.C. §§ 1441 and 1446, the Federal Rules of Civil Procedure, and the Local Rules of this Court.

15. By filing this Notice of Removal, Defendants Keldie and Cowan do not waive any defenses which may be available to them.

Respectfully submitted,

WEBER GALLAGHER SIMPSON STAPLETON  
FIRES & NEWBY LLP

BY: /s/ Samuel H. Foreman  
Samuel H. Foreman, Esquire  
sforeman@wglaw.com

PA77096  
WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY, LLP  
Four PPG Place  
5th Floor  
Pittsburgh, PA 15222  
(412) 281-4541  
(412) 281-4547 FAX

**CERTIFICATE OF SERVICE**

I, Samuel H. Foreman, Esquire, hereby certify that on this date a true and correct copy of the foregoing **NOTICE OF REMOVAL** was sent by first class United States mail, postage prepaid, to the following:

William D. Turner, AM5992  
SCI-Frackville  
1111 Altamount Blvd  
Frackville, PA 17932

Daniel J. Gallagher  
Deputy Attorney General  
Office of the Attorney General  
Civil Litigation Section  
15th Fl., Strawberry Square  
Harrisburg, PA 17120

/S/ Samuel H. Foreman  
Samuel H. Foreman, Esquire

Dated: 02/13/2018



IN THE COMMON PLEAS COURT OF PENNSYLVANIA  
COUNTY OF SCHUYLKILL

WILLIAM D. TURNER,  
PLAINTIFF.

VS.

JOHN E. WETZEL, SECRETARY OF CORRECTIONS;  
CORRECTION CARE SOLUTION, CARL ~~KELLY~~, JOSEF  
SILVA (DEPARTMENT OF CORRECTIONS HEALTH CARE  
SERVICE DIRECTOR), DR. PAUL NOAL, DR. JAY COWAN,  
THE DOC'S HEPATITIS C COMMITTEE, SCI FRACKVILLE  
'S MA KUREN, VISOR MS. KURAS, CHDA MS. HOLLY and  
SHARON SELBI; RN any and all individuals or  
entities responsible for my HEALTH CARE and/or  
DOC MEDICAL POLICIES.  
DEFENDANTS.

DEMAND FOR JURY  
TRIAL

S-89-18

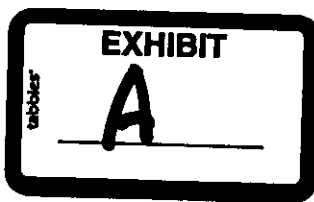
NOTICE TO DEFEND

Pursuant to Rule 86 C.P.; 1018.1 (b):

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must at once take action within twenty(20)days after this complaint., and notice are served. By entering a written appearance personally or by attorney and filing in writing with the Court your issue of defense or objections to the claims set forth against you.; you are warned that if you fail to do so the case my proceed., without you, and a judgment may be entered against you by the Court WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE ISSUE of the complaint or for ANY OTHER CLAIM or RELIEF REQUESTED by the Plaintiff. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS, important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE.  
IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE  
OFFICE SET FORTH BELOW. THIS OFFICE PROVIDES LEGAL  
HELP.

Public Defenders, Suite 7  
420 N. Centre Street  
Pottsville, 17901  
(570) 628-1570.



PROthonotary OFFICE  
2018 JAN 19 A 11:12  
SCHUYLKILL COUNTY PA  
17901

SCHUYLKILL COUNTY  
PENNSYLVANIA

2018 JAN 28  
3:28

IN THE COMMON PLEAS COURT OF PENNSYLVANIA  
COUNTY OF SCHUYIKILL

WILLIAM D. TURNER,  
PLAINTIFF.

VS.

JOHN E. WETZEL, SECRETARY  
OF CORRECTIONS; CORRECTION CARE  
SOLUTION, CARL KEDDIE, JOSEP SILVA  
(DEPARTMENT OF CORRECTIONS HEALTH  
CARE SERVICE DIRECTOR), DR. PAUL  
NOAL, DR. JAY COWAN, THE DOC'S  
HEPATITIS C COMMITTEE, SCI FRACKVILLE'S  
MA KUREN, VISOR MS. KURAS, CHDA MS.  
HOLLY and SHARON SELBI; RN any and all  
individuals or entities responsible for  
my HEALTH CARE and/or DOC MEDICAL  
POLICIES, JANE AND JOHN DOE.  
DEFENDANTS.

CIVIL ACTION

DEMAND FOR JURY  
TRIAL

NO.

PROthonotary Office  
JAN 19 2018 11:12  
SCHUYIKILL COUNTY PA  
17901

CIVIL ACTION

TO. THE HONORABLE JUDGES OF THIS SAID COURT IN THE CAPTION.  
THE HONORABLE JUDGES:

Now cometh William D. Turner, the Plaintiff.; stated  
in the caption and presents:

JURISDICTION.

1. This is a civil action authorized by the State  
Pennsylvania Rules of Civil Procedure. Rule 1001 and other  
civil rules. Which gives this Court jurisdiction. to hear  
this case that seeks declaratory relief, injunction relief  
and compensation.

II. PLAINTIFF.



2. Plaintiff William D. Turner, is presently house at SCI Frackville, 1111 Altamount Blvd, Frackville PA. 17932 who at all times mention herein a prisoner of the Pennsylvania State Department of Corrections.

### III. DEFENDANTS.

3. Defendants ~~John E. Wetzel~~, Secretary of Corrections is being sued once becoming aware of Turner.; ' serious medical needs when grievances are filed such as on August 16, 2017; ~~all~~ which denied Plaintiff Turner, treatment for Hepatitis C, and Arthritis., that was diagnoses, by medical, yet denied.; [all] because of cost. Who can be contact at 1920 Technology Parkway Mechanicsburg, PA 17050; being sued in his individual as well as official capacities, concerning policies.

4. Defendant Carl Keldie relating to Correction Care Solution who makes decisions on protocol for treatment is being sued for disregarding what was diagnoses; and its cause as well as its effect without treatment, all because of cost. That can be contact at 1920 Technology Parkway, Mechanicsburg PA. 17050 being sued in his individual and official capacities.

5. Defendant Josep Silva also (CCS) Correction Care Solution that makes those proctocol decisions for treatment is being sued once disregarding what was diagnoses all because of cost. Who can be contacted at 1920 Technology Mechanicsburg, PA. 17050; b sued in his individual and official capacities.

6. Defendant Dr. Paul Noal concerning Department of Correction Health Care Service Director; is being sued by not addressing what was stated in the grievance on ongoing health

problems without treatment where Plaintiff is presently suffering from ~~asch~~ that burns with other problems. Who can be contacted at 1920 Technology Parkway, Mechanicsburg PA. 17050, sued in his individual and official capacities on pain and suffering.

7. Defendant Dr Jay Cowan another DOC HCSD, is being sued for not addressing what was filed in the grievance, also relying on cost to deny treatment disregarding pain and suffering that can be located at 1920 Technology Parkway, Mechanicsburg PA. 17050. Being sued in their individual and official capacities again concerning pain and suffering.

8. Defendant Dr MA Kuren Department of Corrections Hepatitis C Committee, SCI Frackville, is being sued because of knowing what Plaintiff Turner was going through, yet allowed cost to deny treatment as well as disregarding other medical needs. Who is located at SCI Frackville, 1111 Altamount Blvd., Frackville PA 17932; being sued in their individual as well as in official capacities, on pain and suffering.

9. Defendant Visor Ms. Kuras DOC HCC, of Frackville., is being sued that set in on these decisions who had knowledge relating to Plaintiff's medical needs yet let cost denied the treatment. Also located at SCI Frackville, 1111 Altamount Blvd Frackville PA 17932, being sued in her individual as well as in official capacities, on pain and suffering.

10. Defendant CHDA Ms. Holly, DOC HCC, of Frackville, is being sued that set in on these decisions when it comes to cost and denying treatment. Located at SCI Frackville, 1111 Altamount Blvd, Frackville PA 17932; being sued individual and official capacities, on pain and suffering.

11. Defendant Rn Sharon Selbi, of SCI Frackville, is being sued that also set in on these issues which was diagnose concerning Hep-C and arthritis..That is located at Frackville, 1111 Altamount Blvd, Frackville, PA 17932, being sued in their individual and official capacities, on pain and suffering.

12. Defendants John/Jane Doe., responsible for [any] DOC's policies on treatment.

13. All Defendants have acted under th[e] color [of] State and Federal Laws during the time[s] relevant to this act /complaint.

#### IV. FACTS

14. Plaintiff Turner filed a grievance on August 16, 2017; relating to a continual refusal by the DOC Department of Corrections, to treat Plaintiff's ~~HEPATITIS C~~.

15. This is causing Plaintiff Turner ongoing health problems such as: cirrhosis, concentration, memory issues also chronic fatigue, skin rash with other concerns.

16. Where no Defendant., stated in their Final decision, of December 5, 2017; there was tests taken to address [t]hose medical concerns elaborated above. Only concluded by the Bureau of Health Care Services; that medical care provided, was reasonable and appropriate.

17. Disregarding Plaintiff, present state relating to a rash which is one of the symptom told to Turner by [an]other inmate with hep-C. Where wash up cause the skin to burn, and while perspiring he also suffer, not to mention no meds. for that or arthritis.

18. And with no medical justification on why Turner.; could not receive treatment for Hep-C; when Harvoni, has a 99 percentage cure rate.

19. Where Hepatitis C, infection cause cirrhosis and irreversible scarring of the liver, proving each day with out treatment increases the likelihood of cirrhosis and death.

20. These wanton negligence, reckless and negligence acts by the Defendants from paragraph 3to11, who denied Turner treatment just because of cost relating to Hepatitis C, and arthritis; has place Plaintiff.; in harms way when it comes to the Eighth Amendment on what is diagnose.

#### V. CLAIMS

##### FIRST CAUSE OF ACTIONS

21. The actions of the Defendants stated in paragraph 14to20; concerning wanton negligence, reckless and negligence; has violated due process and equal protection of the law, also the Eighth Amendment.

- a) denied treatment for no medical reasons and
- b) just because of cost on what has been diagnose

##### SECOND CAUSE OF ACTIONS

22. The wanton negligence, reckless, negligence, and disregard for the Eighth Amendment by the Defendants state[d] in this complaint at paragraph 14to20., has place Plaintiff.; in harms way of pain, suffering, cirrhosis and death.

- a) denied treatment contrary to the law and
- b) overlooking Turner's suffering.

23. The actions of the Defendants stated in paragraph 3 through 20 violated Federal and State Law.

#### VI. RELIEF

WHEREFORE, Plaintiff Turner request this Honorable Court., to grant the following relief:

A. Issue a declaratory judgment that the Defendants.; violated the United States Constitution and State Law when they :

- 1) denied treatment for hep-C without no medical justification only cost
- 2) disregard what was diagnose
- 3) not testing for cirrhosis
- 4) follow the Law concerning treatment for Hepatitis C

B. Issue an injunction ordering that Defendants, or their agents.

- 1) refrain from denying treatment for Hep-C
- 2) refrain from disregarding what was diagnose
- 3) refrain from not treating arthritis
- 4) refrain from not following the law relating to treatment of hepatitis C

C. Grant compensatory damages in the following amount:


- 1) 10.000 or more against Defendant Wetzel
- 2) 10.000 or more against Defendant Silva
- 3) 10.000 or more against Defendant Keldie
- 4) 10.000 or more against Defendant Noal
- 5) 10.000 or more against Defendant Cowan
- 6) 10.000 or more against Defendant Kuren
- 7) 10.000 or more against Defendant Kuras
- 8) 10.000 or more against Defendant Holly
- 9) 10.000 or more against Defendant Selbi
- 10) 10.000 or more against John/Jane Doe

D. Grant punitive damage of 100.000 against each of the Defendants.

E. Grant such other relief as it may appear Plaintiff is entitled.

VII. CONCLUSION

Respectfully submitted



William D. Turner

AM 5992

1111 Altamount Blvd  
Frackville, PA 17932

Date. 1.17.18



# Civil Case: S-89-2018

<b>Action</b>	COMPLAINT IN CIVIL ACTION LAW	<b>Initial Cost</b>	0.00
<b>Received</b>	01/19/2018 @ 11:10AM		

<b>Filings</b>	10
<b>Plaintiffs</b>	1
<b>Defendants</b>	11

Paid	
<b>Plaintiff</b>	0.00
<b>Defendant</b>	0.00
<b>Office</b>	0.00
<b>Total</b>	0.00

Plaintiffs	Defendants
TURNER, WILLIAM D	WETZEL, JOHN E KELDIE, CARL SILVA, JOSEPH NOAL, PAUL DR. COWAN, JAY DR. KUREN, MA DR. KURAS, VISOR CHDA, HOLLY SELBI RN, SHARON DOE, JOHN DOE, JANE

Filings				
Date	Filing	Filed By	Cost	To
02/01/2018	SHERIFF'S SERVICE-SEE FILE	SHF 75.80		
01/26/2018	ORDER OF COURT/COPIES MAILED	RUSSELL, JACQUELINE L		
01/26/2018	ORDER GRANTING IN FORMA PAUPERIS	RUSSELL, JACQUELINE L		
01/25/2018	PRAECIPE	TURNER, WILLIAM D		
01/23/2018	CERTIFICATE OF MERIT	TURNER, WILLIAM D		
01/19/2018	T & E	PLAINTIFFS		PLAINTIFF
01/19/2018	STATE TAX (.50)	PLAINTIFFS		PLAINTIFF
01/19/2018	COMPUTER FUND	PLAINTIFFS		PLAINTIFF
01/19/2018	AUTOMATION FUND	PLAINTIFFS		PLAINTIFF
01/19/2018	APPLICATION TO PROCEED IN FORMA PAUPERIS	TURNER, WILLIAM D		

Top

Sheriff Services Information

EXHIBIT

B



**Service Id:**  
**91234**

Date Receive: 01/26/2018 Type Of Service:  
Return Date: 02/01/2018 CIVIL ACTION  
Total Cost: 75.80

ShfCaseNum:  
Deputized From:  
State Service For:  
PENNSYLVANIA

**SERVING on**  
**01/30/2018 08:03**

1111 ALTAMONT BLVD FRACKVILLE

DR. MA KUREN

Completed: **Yes**

Who Served: JEN NEWBERRY Relation:

VISOR KURAS

Completed: **Yes**

Who Served: JEN NEWBERRY Relation: PERSON IN CHARGE

HOLLY CHDA

Completed: **Yes**

Who Served: JEN NEWBERRY Relation:

SHARON SELBI RN

Completed: **Yes**

Who Served: JEN NEWBERRY Relation:

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**Revised: June 28, 2016**

**E-mail any comments or corrections to Webmaster**

IN THE COMMON PLEAS COURT OF PENNSYLVANIA  
COUNTY OF SCHUYIKILL

WILLIAM D. TURNER,  
PLAINTIFF.

VS.

JOHN E. WETZEL, ET AL.  
DEFENDANTS.

CERTIFICATE OF MERIT

CIVIL ACTION

NO. J-89

CERTIFICATE OF MERIT

I, William D. Turner, filed this certificate of merit concerning the complaint on what was diagnose, where the Defendants deviated from an acceptable professional standard by disregarding care and the law on such.<sup>1</sup>

Respectfully submitted

William D. Turner  
William D. Turner AM5992  
Pro-se  
SCI Frackville  
1111 Altamount Blvd  
Frackville, PA 17932

Date. 1.18.18

1. warranting no other opinion.

VERIFICATION

I, verify that I'am the Plaintiff as designated in the civil action and that the facts and statement contained in this Complaint and Certificate of Merit are true as well as correct to the best of Plaintiff knowledge. Also understand by and that any false statements are made is subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

(s) William D. Turner  
William D. Turner  
AM 5992  
1111 Altamount Blvd  
Frackville, PA 17932

Date. 1.18.18

## IN THE COURT OF COMMON PLEAS OF SCHUYLKILL COUNTY

WILLIAM D. TURNER

Plaintiff

No.

S-89-18

vs.

JOHN E. WETZEL, ET AL.

Defendant

PRAECIPE FOR CERTIFICATION - PROTHONOTARY FORM 205.2(b)

TO PROTHONOTARY: Transmit the attached filing to the Court Administrator for Assignment to a Judge. The nature of the filing and requested action is as follows:

XXX Jury Trial - (Complete Certificate of Readiness; pay \$107 Filing Fee)

Notice: *In matters requiring a non-jury trial or hearing opposing party is required to submit a report in WRITING to the Court Administrator within 10 days, (1) listing the names of the witnesses they will use at hearing; and (2) an estimate of time required to present their case.*

Non-Jury Trial (Pursuant to Pa.R.C.P.1038)

Any matter dispositive of the case e.g.:

☐ Equity Actions; ☐ MDJ Appeals; ☐ Ejectment actions;  
☐ Name Change Actions; ☐ Contract Action; ☐ Replevin; ☐ Mandamus  
☐ Tax Appeals; ☐ Ready for Trial or ☐ Issues Pending

If Tax Appeal is not trial ready - How much time is required to be ready for trial?

☐ Other \_\_\_\_\_ (specify)

I estimate it will require \_\_\_\_\_ hours to present the plaintiff's/defendant's case and I will present only the following witnesses for testimony:

Hearing required/requested: Reason for Hearing: \_\_\_\_\_

- ☐ Special Relief; ☐ Contempt Petition; ☐ Preliminary Injunctions;  
☐ Discovery Hearing;  
☐ Other \_\_\_\_\_ (specify)

I estimate it will require \_\_\_\_\_ hours to present the plaintiffs/defendant's case and I will present only the following witnesses for testimony:

**Failure to provide the witness list and time requirement may preclude witnesses from testifying.**

Petition pursuant to Pa.R.C.P. 206.1 requesting ☐ Issuance of Rule to Show Cause;

- ☐ Transfer to Court for disposition, no answer having been filed;  
☐ Transfer to Court for disposition, contested matter and fact finding complete or unnecessary;  
☐ Other \_\_\_\_\_ (specify)

Issue that can be decided on the record and briefs, being: ☐ Gov't Appeal;

- ☐ Exceptions; ☐ Judgment on the Pleadings; ☐ Summary Judgment;  
☐ Other \_\_\_\_\_ (specify)

Issue that can be assigned for immediate action, being: ☐ Stipulation;

- ☐ Uncontested Motion; ☐ Motion for Appointment; ☐ Quiet Title Motion;  
☐ Other \_\_\_\_\_ (specify)

Contested Motion (Memo attached), being: ☐ Discovery Motion;

- ☐ Other \_\_\_\_\_ (specify)

☐ Transmit to Custody Officer. Reason: \_\_\_\_\_

(If hearing is required, complete the time and witness portion of this form).

PRO\_SE



Attorney for

Date: 2-12-18

For Defendant: JOHN E. WETZEL, ET AL.

For Plaintiff: WILLIAM D. TURNER

Revised: 2/26/16

## COURT OF COMMON PLEAS OF SCHUYLKILL COUNTY—CIVIL ACTION-LAW

WILLIAM D. TURNER,  
Plaintiff

: No. S-89-18  
:  
:  
:  
:  
:  
:  
:

vs.

JOHN E. WETZEL, et al.,  
Defendants

ORDER OF COURT

RUSSELL, J.

AND NOW, this 20<sup>th</sup> day of January, 2018, it is hereby ORDERED Plaintiff may proceed in forma pauperis and proceed without payment of costs as provided by law. However, he shall inform the Court of any change in his financial condition.

BY THE COURT,

Russell J.

RECEIVED  
JAN 16 2018  
CLERK OF COURT  
SCHUYLKILL COUNTY

Wed Jan 31, 2018 01:16PM

PAGE: 11

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(610) 624-5570



## \*\* AFFIDAVIT OF RETURN \*\*

PLAINTIFF: TURNER, WILLIAM D  
V S  
DEFENDANT: METZEL, JOHN E ET AL

ATTORNEY:

COURT NUMBER : 5-89-2018  
FILED BY :  
TYPE OF PAPER : CIVIL ACTION  
SERVING NUMBER : 91234  
PRO FILE DATE : 01/26/2018  
EXPIRATION : 02/25/2018  
SHF RECEIVED : 01/26/2018  
DEP RETURNED : 02/01/2018

## (PEOPLE TO BE SERVED)

NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
METZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, C
KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, C
SILVA, JOSEF	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, C
NGAL, PAUL CR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, C
OGHAN, JAY CR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, C
Service for KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
55231 RM. SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## (ATTEMPTS AT SERVICE)

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	01/30/2018	08:03	JEN NEWBERRY	1111 ALTAMONT BLVD		FRACKVILLE	PA	17931	40	21.80
* REMARKS : SERVICE MADE BY DEPUTY MORGAN, J										

Total : 21.80

Total Fee Charge for all Services : 21.80

Wed Jan 31, 2018 01:36PM

PAGE: 12

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \*\* AFFIDAVIT OF RETURN \*\*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

JEN NEWBERRY ()  
1111 ALTAMONT BLVD  
FRACKVILLE PA

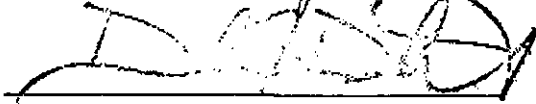
ON  
01/30/2018  
At 08:03

SWORN and subscribed before me this 5

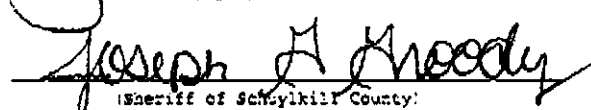
SO ANSWERS

day of

February, 2018

  
(Prothonotary)

  
(Deputy Sheriff)

  
(Sheriff of Schuylkill County)

End - of - Return (S-89-2018)



Wed Jan 11, 2018 01:38PM

PAGE: 13

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSTOWN, PENNSYLVANIA 17901  
(570) 422-5570

## \* \* AFFIDAVIT OF RETURN \* \*

PLAINTIFF: TURNER, WILLIAM O  
V S  
DEFENDANT: WETZEL, JOHN E ET AL

ATTORNEY:

COURT NUMBER : S-59-2018  
FILED BY :  
TYPE OF PAPER : CIVIL ACTION  
SERVING NUMBER : 51234  
PRO FILE DATE : 01/26/2018  
EXPIRATION : 02/25/2018  
SHF RECEIVED : 01/26/2018  
OSP RETURNED : 02/01/2018

## PEOPLE TO BE SERVED:

NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
REDDIE, CARL	CORRECTION CARE SOLC	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
SILVA, JOSEF	CORRECTION CARE SOLC	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
NOAL, PAUL FR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
KUHN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
Service for KUPAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
CHDR, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## (ATTEMPTS AT SERVICE)

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	01/30/2018	08:03	JEN NEWBERRY	1111 ALTAMONT BLVD		FRACKVILLE	PA	17932		0.00
* REMARKS : SERVICE MADE BY DEPUTY MORGAN, J										

Total : 0.00

Total Fee Charge for all Services : 21.80

Wed Jan 31, 2018 01:36PM

PAGE: 14

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* AFFIDAVIT OF RETURN \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

JEN NEWBERRY (PERSON IN CHARGE)  
1111 ALTAMONT BLVD  
FRACKVILLE PA

ON  
01/30/2018  
at 08:03

SWORN and subscribed before me this 5

SO ANSWERS

day of

February 2018

Jennifer Morgan  
(Deputy Sheriff)

Joseph A. Shaddy  
(Sheriff of Schuylkill County)

[Signature]  
(Prothonotary)

Enc - of - Return (S-89-2018)

Wed Jan 31, 2018 01:36PM

PAGE: 15

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POITTSVILLE, PENNSYLVANIA 17901  
(870) 622-5570

## AFFIDAVIT OF RETURN

PLAINTIFF: TURNER, WILLIAM D

V S

DEFENDANT: WETZEL, JOHN E ET AL

ATTORNEY:

COURT NUMBER : S-89-2118

FILED BY :

TYPE OF PAPER : CIVIL ACTION

SERVING NUMBER : 91234

PRO FILE DATE : 01/26/2018

EXPIRATION : 03/25/2018

SHF RECEIVED : 01/26/2018

DSF RETURNED : 02/01/2018

## PEOPLE TO BE SERVED:

NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
KELDIS, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
SILVA, JOSEF	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
MOAL, PAUL DR.	DEPT OF CORRECTION M	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
SILBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## (ATTEMPTS AT SERVICE)

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	01/30/2018	08:03	JEN NEWBERRY	1111 ALTAMONT BLVD		FRACKVILLE	PA	17931		0.00
REMARKS : SERVICE MADE BY DEPUTY MORGAN, J										

Total : 0.00

Total Fee Charge for all Services : 21.00

Wed Jan 31, 2018 01:36PM

PAGE: 16

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-9670

## \* \* A F F I D A V I T O F R E T U R N \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

JEN NEWBERRY ( )  
1111 ALTAMONT BLVD  
FRACKVILLE PA

ON  
01/30/2018  
at 08:03

SWORN and subscribed before me this 5

SC ANSWERS

day of February, 2018

Jennifer Morgan  
(Deputy Sheriff)  
Joseph L. Moody  
(Sheriff of Schuylkill County)

(Prothonotary)

End - of - Return (3-89-2018)

Wed Jan 31, 2018 01:26PM

PAGE: 17

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 522-5570

## \* \* AFFIDAVIT OF RETURN \* \*

PLAINTIFF: TURNER, WILLIAM D  
V S  
DEFENDANT: WETZEL, JOHN E ET AL

ATTORNEY:

COURT NUMBER : 8-89-2018  
FILED BY :  
TYPE OF PAPER : CIVIL ACTION  
SERVING NUMBER : 91224  
PRO FILE DATE : 01/26/2018  
EXPIRATION : 02/25/2018  
SWF RECEIVED : 01/26/2018  
DEF RETURNED : 02/01/2018

## ( PEOPLE TO BE SERVED )

NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
KELCIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
SILVA, JOSEF	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
COMAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
KURAS, VIGOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
CHOA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
Service for SELB, RM, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( ATTEMPTS AT SERVICE )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	01/30/2018	08:03	JEN NEWBERRY	1111 ALTAMONT BLVD		FRACKVILLE	PA	17931		0.00

REMARKS : SERVICE MADE BY DEPUTY MORGAN, J

Total : 0.00

Total Fee Charge for all Services : 21.80

Wed Jan 31, 2018 01:36PM

PAGE: 18

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(870) 622-5570

## \*\* AFFIDAVIT OF RETURN \*\*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

JEN NEWBERRY ( )  
1111 ALTAMONT BLVD  
FRACKVILLE PA

ON  
01/30/2018  
at 08:03

SWORN and subscribed before me this 5

SO ANSWERS

day of February 2018

Jennifer Morgan  
(Deputy Sheriff)

[Signature]  
(Prothonotary)

Joseph M. Moody  
(Sheriff of Schuylkill County)

End - of - Return (5-85-2018)

Wed Jan 31, 2018 01:36PM

PAGE: 19

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \*\* AFFIDAVIT OF RETURN \*\*

## SERVICE RETURN COMMENTS

1. IN FORMA PAUPERIS FILED

## COSTS INFORMATION

DESCRIPTION	PAYMENTS	CHARGES	BALANCE
R D & R		9.00	-9.00
SERVICE		9.00	-18.00
ATTESTING		26.00	-54.00
SERVICE FEE		21.80	-75.80

Cost of Service : 75.80  
County Charge : 75.80

## COUNTY CHARGE

End - of - Return (3-89-2018)

COUNTY CHARGE  
OFFICE OF THE SHERIFF  
OF SCHUYLKILL COUNTY

DATE : 02/01/2018

Case Ref : S-89-2018

Service ID: 91234

Type : CIVIL ACTION

Defendant: JOHN E WITTEL

Address 1 : SECRETARY OF CORRECTIONS

Address 2 : 1920 TECHNOLOGY PARKWAY

City : MECHANICSBURG

Cost of Service : 75.00

County Charge : 75.00



IN THE COMMON PLEAS COURT OF PENNSYLVANIA  
COUNTY OF SCHUYLKILL

WILLIAM D. TURNER,  
PLAINTIFF.

VS.

JOHN E. WETZEL, SECRETARY OF CORRECTIONS;  
CORRECTION CARE SOLUTION, CARL ~~KEDDE~~, JOSEF  
SILVA (DEPARTMENT OF CORRECTIONS HEALTH CARE  
SERVICE DIRECTOR), DR. PAUL NOAL, DR. JAY COWAN,  
THE DOC'S HEPATITIS C COMMITTEE, SCI FRACKVILLE  
'S MA KUREN, VISOR MS. KURAS, CHDA MS. HOLLY and  
SHARON SELBI; RN any and all individuals or  
entities responsible for my HEALTH CARE and/or  
DOC MEDICAL POLICIES.  
DEFENDANTS.

DEMAND FOR JURY  
TRIAL

S-89-18

NOTICE TO DEFEND

Pursuant to Rule 86 C.P.; 1018.1 (b):

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must at once take action within twenty(20)days after this complaint., and notice are served. By entering a written appearance personally or by attorney and filing in writing with the Court your issue of defense or objections to the claims set forth against you.; you are warned that if you fail to do so the case my proceed., without you, and a judgment may be entered against you by the Court WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE ISSUE of the complaint or for ANY OTHER CLAIM or RELIEF REQUESTED by the Plaintiff. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS, important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE.  
IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE  
OFFICE SET FORTH BELOW. THIS OFFICE PROVIDES LEGAL  
HELP.

Public Defenders, Suite 7  
420 N. Centre Street  
Pottsville, 17901  
(570) 628-1570.

PROthonotary Office  
2018 JAN 19 A 11:12  
SCHUYLKILL COUNTY PA  
17901

2018 JAN 28  
3:28  
SCHUYLKILL COUNTY  
PENNSYLVANIA

IN THE COMMON PLEAS COURT OF PENNSYLVANIA  
COUNTY OF SCHUYIKILL

WILLIAM D. TURNER,  
PLAINTIFF.

VS.

JOHN E. WETZEL, SECRETARY  
OF CORRECTIONS; CORRECTION CARE  
SOLUTION, CARL KEDDIE, JOSEP SILVA  
(DEPARTMENT OF CORRECTIONS HEALTH  
CARE SERVICE DIRECTOR), DR. PAUL  
NOAL, DR. JAY COWAN, THE DOC'S  
HEPATITIS C COMMITTEE, SCI FRACKVILLE'S  
MA KUREN, VISOR MS. KURAS, CHDA MS.  
HOLLY and SHARON SELBI; RN any and all  
individuals or entities responsible for  
my HEALTH CARE and/or DOC MEDICAL  
POLICIES, JANE AND JOHN DOE.  
DEFENDANTS.

CIVIL ACTION

DEMAND FOR JURY  
TRIAL

NO.

179011  
JAN 19 2018  
HONORARY OFFICE  
SCHUYIKILL COUNTY PA

CIVIL ACTION

TO. THE HONORABLE JUDGES OF THIS SAID COURT IN THE CAPTION.  
THE HONORABLE JUDGES:

Now cometh William D. Turner, the Plaintiff.; stated  
in the caption and presents:

JURISDICTION.

1. This is a civil action authorized by the State  
Pennsylvania Rules of Civil Procedure. Rule 1001 and other  
civil rules. Which gives this Court jurisdiction. to hear  
this case that seeks declaratory relief, injunction relief  
and compensation.

II. PLAINTIFF.

2. Plaintiff William D. Turner, is presently house at SCI Frackville, 1111 Altamont Blvd, Frackville PA. 17932 who at all times mention herein a prisoner of the Pennsylvania State Department of Corrections.

### III. DEFENDANTS.

3. Defendants ~~John E. Wetzel~~, Secretary of Corrections is being sued once becoming aware of Turner.; ' serious medical needs when grievances are filed such as on August 16, 2017; ~~and~~ which denied Plaintiff Turner, treatment for Hepatitis C, and Arthritis., that was diagnose~~d~~, by medical, yet denied.; [all] because of cost. Who can be contact at 1920 Technology Parkway Mechanicsburg, PA 17050; being sued in his individual as well as official capacities, concerning policies.

4. Defendant Carl Keldie relating to Correction Care Solution who makes decisions on protocol for treatment is being sued for disregarding what was diagnose~~d~~, and its cause as well as its effect without treatment, all because of cost. That can be contact at 1920 Technology Parkway, Mechanicsburg PA. 17050 being sued in his individual and official capacities.

5. Defendant Josep Silva also (CCS) Correction Care Solution that makes those proctocol decisions for treatment is being sued once disregarding what was diagnoses all because of cost. Who can be contacted at 1920 Technology Mechanicsburg, PA. 17050; b sued in his individual and official capacities.

6. Defendant Dr. Paul Noal concerning Department of Correction Health Care Service Director; is being sued by not addressing what was stated in the grievance on ongoing health

problems without treatment where Plaintiff is presently suffering from ~~again~~ that burns with other problems. Who can be contacted at 1920 Technology Parkway, Mechanicsburg PA. 17050, sued in his individual and official capacities on pain and suffering.

7. Defendant Dr Jay Cowan another DOC HCSD, is being sued for not addressing what was filed in the grievance, also relying on cost to deny treatment disregarding pain and suffering that can be located at 1920 Technology Parkway, Mechanicsburg PA. 17050. Being sued in their individual and official capacities again concerning pain and suffering.

8. Defendant Dr MA Kuren Department of Corrections Hepatitis C Committee, SCI Frackville, is being sued because of knowing what Plaintiff Turner was going through, yet allowed cost to deny treatment as well as disregarding other medical needs. Who is located at SCI Frackville, 1111 Altamount Blvd., Frackville PA 17932; being sued in their individual as well as in official capacities, on pain and suffering.

9. Defendant Visor Ms. Kuras DOC HCC, of Frackville., is being sued that set in on these decisions who had knowledge relating to Plaintiff's medical needs yet let cost denied the treatment. Also located at SCI Frackville, 1111 Altamount Blvd Frackville PA 17932, being sued in her individual as well as in official capacities, on pain and suffering.

10. Defendant CHDA Ms. Holly, DOC HCC, of Frackville, is being sued that set in on these decisions when it comes to cost and denying treatment. Located at SCI Frackville, 1111 Altamount Blvd, Frackville PA 17932; being sued individual and official capacities, on pain and suffering.

11. Defendant Rn Sharon Selbi, of SCI Frackville, is being sued that also set in on these issues which was diagnose concerning Hep-C and arthritis..That is located at Frackville, 1111 Altamount Blvd, Frackville, PA 17932, being sued in their individual and official capacities, on pain and suffering.

12. Defendants John/Jane Doe., responsible for [many] DOC's policies on treatment.

13. All Defendants have acted under th[e] color [of] State and Federal Laws during the time[s] relevant to this act /complaint.

#### IV. FACTS

14. Plaintiff Turner filed a grievance on August 16, 2017; relating to a continual refusal by the DOC Department of Corrections, to treat Plaintiff's ~~HEPATITIS C~~.

15. This is causing Plaintiff Turner ongoing health problems such as: cirrhosis, concentration, memory issues also chronic fatigue, skin rash with other concerns.

16. Where no Defendant., stated in their Final decision.,  
16. of December 5, 2017; there was tests taken to address [t]hose medical concerns elaborated above. Only concluded by the Bureau of Health Care Services; that medical care provided, was reasonable and appropriate.

17. Disregarding Plaintiff, present state relating to a rash which is one of the symptom told to Turner by [an]other inmate with hep-C. Where wash up cause the skin to burn, and while perspiring he also suffer, not to mention no meds. for that or arthritis.

18. And with no medical justification on why Turner.; could not receive treatment for Hep-C; when Harvoni, has a 99 percentage cure rate.

19. Where Hepatitis C, infection cause cirrhosis and irreversible scarring of the liver, proving each day with out treatment increases the likelihood of cirrhosis and death.

20. These wanton negligence, reckless and negligence acts by the Defendants from paragraph 3to11, who denied Turner treatment just because of cost relating to Hepatitis C, and arthritis; has place Plaintiff.; in harms way when it comes to the Eighth Amendment on what is diagnose.

#### V. CLAIMS

##### FIRST CAUSE OF ACTIONS

21. The actions of the Defendants stated in paragraph 14to20; concerning wanton negligence, reckless and negligence, has violated due process and equal protection of the law, also the Eighth Amendment.

- a) denied treatment for no medical reasons and
- b) just because of cost on what has been diagnose

##### SECOND CAUSE OF ACTIONS

22. The wanton negligence, reckless, negligence, and disregard for the Eighth Amendment by the Defendants state[d] in this complaint at paragraph 14to20., has place Plaintiff.; in harms way of pain, suffering, cirrhosis and death.

- a) denied treatment contrary to the law and
- b) overlooking Turner's suffering.

23. The actions of the Defendants stated in paragraph 3 through 20 violated Federal and State Law.

#### VI. RELIEF

WHEREFORE, Plaintiff Turner request this Honorable Court., to grant the following relief:

A. Issue a declaratory judgment that the Defendants.; violated the United States Constitution and State Law when they :

- 1) denied treatment for hep-C without no medical justification only cost
- 2) disregard what was diagnose
- 3) not testing for cirrhosis
- 4) follow the Law concerning treatment for Hepatitis C

B. Issue an injunction ordering that Defendants, or their agents.

- 1) refrain from denying treatment for Hep-C
- 2) refrain from disregarding what was diagnose
- 3) refrain from not treating arthritis
- 4) refrain from not following the law relating to treatment of hepatitis C

C. Grant compensatory damages in the following amount:

- 1) 10.000 or more against Defendant Wetzel
- 2) 10.000 or more against Defendant Silva
- 3) 10.000 or more against Defendant Keldie
- 4) 10.000 or more against Defendant Noal
- 5) 10.000 or more against Defendant Cowan
- 6) 10.000 or more against Defendant Kuren
- 7) 10.000 or more against Defendant Kuras
- 8) 10.000 or more against Defendant Holly
- 9) 10.000 or more against Defendant Selbi
- 10) 10.000 or more against John/Jane Doe

D. Grant punitive damage of 100.000 against each of the Defendants.

E. Grant such other relief as it may appear Plaintiff is entitled.

VII. CONCLUSION

Respectfully submitted



William D. Turner

AM 5992

1111 Altamount Blvd  
Frackville, PA 17932

Date. 1.17.18





IN THE COURT OF COMMON PLEAS OF SCHUYLKILL COUNTY

WILLIAM D. TURNER,

Plaintiff,

v.

JOHN E. WETZEL, SECRETARY OF  
CORRECTIONS; CORRECTION CARE  
SOLUTION, CARL KELDIE, JOSEP SILVA  
(DEPARTMENT OF CORRECTIONS  
HEALTH CARE SERVICE DIRECTOR),  
DR. PAUL NOAL, DR. JAY COWAN, THE  
DOC'S HEPATITIS C COMMITTEE, SCI  
FRACKVILLE'S MA KUREN, VISOR MS.  
KURAS, CHDA MS. HOLLY and SHARON  
SELBI; RN any and all individuals or entities  
responsible for my HEALTH CARE and/or  
DOC MEDICAL POLICIES,

Defendant.

CIVIL DIVISION

Case No.: S-89-18

**NOTICE OF FILING NOTICE OF  
REMOVAL TO UNITED STATES  
DISTRICT COURT**

Filed on behalf of Defendants

Jay Cowan

Carl Keldie

Counsel of Record for this Party

Samuel H. Foreman

PA I.D. 77096

WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY LLP

Firm #594

Four PPG Place

5<sup>th</sup> Floor

Pittsburgh, PA 15222

Phone: (412) 281-4541

Fax: (412) 281-4547



IN THE COURT OF COMMON PLEAS OF SCHUYLKILL COUNTY

WILLIAM D. TURNER,

Plaintiff,

v.

JOHN E. WETZEL, SECRETARY OF  
CORRECTIONS; CORRECTION CARE  
SOLUTION, CARL KELDIE, JOSEP SILVA  
(DEPARTMENT OF CORRECTIONS  
HEALTH CARE SERVICE DIRECTOR),  
DR. PAUL NOAL, DR. JAY COWAN, THE  
DOC'S HEPATITIS C COMMITTEE, SCI  
FRACKVILLE'S MA KUREN, VISOR MS.  
KURAS, CHDA MS. HOLLY and SHARON  
SELBI; RN any and all individuals or entities  
responsible for my HEALTH CARE and/or  
DOC MEDICAL POLICIES,

Defendant.

:  
:  
: CIVIL DIVISION  
:  
: Case No.: S-89-18  
:  
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:

**NOTICE OF FILING NOTICE OF REMOVAL  
TO UNITED STATES DISTRICT COURT**

PLEASE TAKE NOTICE that the undersigned have, on this date, filed a Notice for Removal of this action in the United States District Court, Middle District of Pennsylvania. A true and correct copy of the Notice of Removal is attached and served with this notice.

Respectfully submitted,

**WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY, LLP**

By:



Samuel H. Foreman, Esquire  
Meghan K. Adkins, Esquire  
Attorney for Defendants  
Jay Cowan and Carl Keldie

Date: February 13, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **NOTICE OF FILING NOTICE OF REMOVAL**  
**TO UNITED STATES DISTRICT COURT** was served via United States mail, first class,  
postage prepaid, this 13th day of February, 2018, on the following:

William D. Turner, AM5992  
SCI-Frackville  
1111 Altamount Blvd  
Frackville, PA 17932

Daniel J. Gallagher  
Deputy Attorney General  
Office of the Attorney General  
Civil Litigation Section  
15th Fl., Strawberry Square  
Harrisburg, PA 17120

WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY LLP

BY: \_\_\_\_\_



Samuel H. Foreman  
Meghan K. Adkin  
Attorneys for Defendants

3

COURT OF COMMON PLEAS OF SCHUYLKILL COUNTY--CIVIL ACTION-LAW

WILLIAM D. TURNER,  
Plaintiff

: No. S-89-18

vs.

JOHN E. WETZEL, et al.,  
Defendants

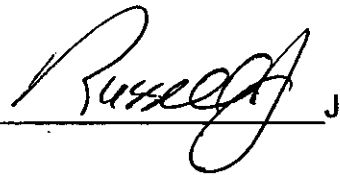
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**ORDER OF COURT**

RUSSELL, J.

AND NOW, this 26<sup>th</sup> day of January, 2018, it is hereby ORDERED Plaintiff may proceed in forma pauperis and proceed without payment of costs as provided by law. However, he shall inform the Court of any change in his financial condition.

BY THE COURT,

 J.

NOTHONOTARY OFFICE  
JAN 26 P 1:30  
SCHUYLKILL COUNTY PA  
17801

IN THE COURT OF COMMON PLEAS OF SCHUYLKILL COUNTY

WILLIAM D. TURNER

Plaintiff

No.

S-89-18

vs.

JOHN E. WETZEL, ET AL.

Defendant

PRAECIPE FOR CERTIFICATION - PROTHONOTARY FORM 205.2(b)

TO PROTHONOTARY: Transmit the attached filing to the Court Administrator for Assignment to a Judge. The nature of the filing and requested action is as follows:

XXX

Jury Trial - (Complete Certificate of Readiness; pay \$107 Filing Fee)

**Notice:** In matters requiring a non-jury trial or hearing opposing party is required to submit a report in WRITING to the Court Administrator within 10 days,  
(1) listing the names of the witnesses they will use at hearing; and  
(2) an estimate of time required to present their case.

Non-Jury Trial (Pursuant to Pa.R.C.P.1038)

Any matter dispositive of the case e.g.:

☐ Equity Actions; ☐ MDJ Appeals; ☐ Ejectment actions;  
☐ Name Change Actions; ☐ Contract Action; ☐ Replevin; ☐ Marital Matters  
☐ Tax Appeals: ☐ Ready for Trial or ☐ Issues Pending

If Tax Appeal is not trial ready - How much time is required to be ready for trial? \_\_\_\_\_

☐ Other \_\_\_\_\_ (specify)

I estimate it will require \_\_\_\_\_ hours to present the plaintiff's/defendant's case and I will present only the following witnesses for testimony:

PROTHONOTARY OFFICE  
2018 JAN 25 10:00  
SCHUYLKILL COUNTY  
17901

Hearing required/requested: Reason for Hearing: \_\_\_\_\_

☐ Special Relief; ☐ Contempt Petition; ☐ Preliminary Injunctions;  
☐ Discovery Hearing;  
☐ Other \_\_\_\_\_ (specify)

I estimate it will require \_\_\_\_\_ hours to present the plaintiff's/defendant's case and I will present only the following witnesses for testimony:

**Failure to provide the witness list and time requirement may preclude witnesses from testifying.**

Petition pursuant to Pa.R.C.P. 206.1 requesting ☐ Issuance of Rule to Show Cause:

☐ Transfer to Court for disposition, no answer having been filed;  
☐ Transfer to Court for disposition, contested matter and fact finding complete or unnecessary;  
☐ Other \_\_\_\_\_ (specify)

Issue that can be decided on the record and briefs, being: ☐ Gov't Appeal;

☐ Exceptions; ☐ Judgment on the Pleadings; ☐ Summary Judgment;  
☐ Other \_\_\_\_\_ (specify)

Issue that can be assigned for immediate action, being: ☐ Stipulation;

☐ Uncontested Motion; ☐ Motion for Appointment; ☐ Quiet Title Motion;  
☐ Other \_\_\_\_\_ (specify)

Contested Motion (Memo attached), being: ☐ Discovery Motion;

☐ Other \_\_\_\_\_ (specify)

☐ Transmit to Custody Officer. Reason: \_\_\_\_\_

(If hearing is required, complete the time and witness portion of this form).

PRO\_SE

*William D. Turner*

Attorney for

Date: 4.1.2018

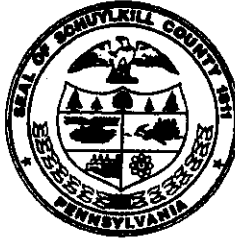
For Defendant: JOHN E. WETZEL, ET AL.

For Plaintiff: WILLIAM D. TURNER

Revised: 2/26/16

**COUNTY OF SCHUYLKILL**  
**OFFICE OF THE PROTHONOTARY**

DAVID J. DUTCAVICH, PROTHONOTARY  
JOHN FEKETY, FIRST DEPUTY  
DEBORAH A. CONWAY, SECOND DEPUTY  
ERIC PROCK, SOLICITOR



401 North Second Street  
Pottsville, PA 17901-2520  
E-Mail: [prothy@co.schuylkill.pa.us](mailto:prothy@co.schuylkill.pa.us)  
Telephone: 570-628-1270  
In Schuylkill County: 668-5944 Ext. 1270  
695-2156 Ext. 1270  
874-4058 Ext. 1270  
Facsimile: 570-628-1261

Date: 1/18/18

Docket: S-89-18

To William Tucker:

Your filing in the above-mentioned matter is deficient for the following reason(s):

1. Incorrect Fee. Fee Required: \$ \_\_\_\_\_

Documents are not accepted without correct filing fee. Your documents are enclosed.

**Action Required:** Please re-submit documents with correct fee.

NOTE: A current Fee Schedule is available at the office or online at:

[http://co.schuylkill.pa.us/Offices/Prothonotary/Fee%20Schedule\\_Compact2015.pdf](http://co.schuylkill.pa.us/Offices/Prothonotary/Fee%20Schedule_Compact2015.pdf)

2. Attorney ID Number Incomplete: \_\_\_\_\_

**Action Required:** Enter your ID Number above and fax back to our office.

Please ensure that your Attorney ID Number appears on future filings.

3. The above-mentioned matter has been filed; however, the matter cannot be transmitted to the court without the filing of a Praeipe.

**Action Required:** A copy of the Praeipe (205.2(b)) is enclosed. Please complete and return for filing and transmittal to the court.

4. Original documents have not been received from the Schuylkill County Sheriff.

**Action Required:** Please contact Schuylkill County Sheriff at 570-628-1440.

5. The above-mentioned matter has been filed; however, the matter cannot be transmitted to the court without the filing of a *Mortgage Foreclosure Diversion Program Certification of Participation* Cover Sheet. (Administrative Order 2011.3)

**Action Required:** A copy of the Cover Sheet is enclosed. Please complete and return for filing and transmittal to the court.

6. Other: Please fill out the Praeipe to get your

**Action Required:** IFP to the Courts

NOTE: Please return a copy of this notice with your correspondence. If you require a return receipt and/or certificate to be mailed, include a SELF-ADDRESSED ENVELOPE WITH POSTAGE. In lieu of mailing, receipts/certificates can also be requested and picked up at our office.



*[Handwritten initials]*

IN THE COURT OF COMMON PLEAS

SCHUYIKILL COUNTY, PENNSYLVANIA

WILLIAM D. TURNER,  
PLAINTIFF.

CIVIL ACTION

V.

No.

*S-89-18*

JOHN E. WETZEL, ET AL.,  
DEFENDANTS.

IN FORMA PAUPERIS STATEMENT

I, William D. Turner, state under penalties provided by 18 PA.C.S.A. § 4902 (a) (1) (i) (sworn  
falsification to authorities) that:

PROTHONOTARY OFFICE  
2018 JAN 19 A 10  
SCHUYIKILL COUNTY PA  
17301

1. I am the petitioner in the above-entitled action.
2. I have read the foregoing petition and know the contents and the same are true to my own knowledge, except those matters stated to be alleged about persons other than myself, and, those matters I believe to be true.
3. This statement I made to inform the court of my status of indigence.
4. I am not presently employed other than by virtue of low paying prison wages.
5. I have not received recently any income from a business, profession, or other form of employment, or in the form of rent payments, interest, dividends, pensions, annuities, social security benefits, support payments or other resources.
6. I do not own any real estate, stocks, bonds or notes.
7. I do not own any cash or checking or savings account.
8. There is no one dependent upon me for financial support, due to my incarceration.

I understand that a false statement of fact, pertaining to my ability to prepay costs in this statement will subject me to penalties for perjury.

Dated: 1.17.18

*William D. Turner*

IN THE COMMON PLEAS COURT OF PENNSYLVANIA  
COUNTY OF SCHUYLKILL

WILLIAM D. TURNER,  
PLAINTIFF.

VS.

JOHN E. WETZEL, ET AL,  
DEFENDANTS.

PRAECIPE TO FILE  
AND SERVE DEFENDANTS

PRAECIPE TO FILE AND  
AND SERVE DEFENDANTS

CLERK OF COURT  
COUNTY OF SCHUYLKILL  
JAN 19 A 11:10  
17901

This is a Praecipe to file complaint and serve the Defendants  
accordingly to the Pennsylvania Rule of Court relating to the  
Rules of Civil Procedure. 205.1

Respectfully submitted

William D. Turner

William D. Turner  
AM 5992  
1111 Altamont Blvd  
Frackville, PA 17932

Date. 1.17.18.

IN THE COMMON PLEAS COURT OF PENNSYLVANIA  
COUNTY OF SCHUYLKILL

WILLIAM D. TURNER,  
PLAINTIFF.

VS.

JOHN E. WETZEL, SECRETARY OF CORRECTIONS;  
CORRECTION CARE SOLUTION, CARL ~~KEDDIE~~, JOSEF  
SILVA (DEPARTMENT OF CORRECTIONS HEALTH CARE  
SERVICE DIRECTOR), DR. PAUL NOAL, DR. JAY COWAN,  
THE DOC'S HEPATITIS C COMMITTEE, SCI FRACKVILLE  
'S MA KUREN, VISOR MS. KURAS, CHDA MS. HOLLY and  
SHARON SELBI; RN any and all individuals or  
entities responsible for my HEALTH CARE and/or  
DOC MEDICAL POLICIES.  
DEFENDANTS.

DEMAND FOR JURY  
TRIAL

PROthonotary OFFICE  
2018 JAN 19 A 11:10  
SCHUYLKILL COUNTY PA  
17901

NOTICE TO DEFEND

Pursuant to Rule of C.P.; 1018.1 (b):

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must at once take action within twenty(20)days after this complaint., and notice are served. By entering a written appearance personally or by attorney and filing in writing with the Court your issue of defense or objections to the claims set forth against you.; you are warned that if you fail to do so the case my proceed., without you, and a judgment may be entered against you by the Court WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE ISSUE of the complaint or for ANY OTHER CLAIM or RELIEF REQUESTED by the Plaintiff. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS, important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE.  
IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE  
OFFICE SET FORTH BELOW. THIS OFFICE PROVIDES LEGAL  
HELP.

Public Defenders, Suite 7  
420 N. Centre Street  
Pottsville, 17901  
(570) 628-1570.

SHY  
LW.

IN THE COMMON PLEAS COURT OF PENNSYLVANIA  
COUNTY OF SCHUYIKILL

WILLIAM D. TURNER,  
PLAINTIFF.

VS.

JOHN E. WETZEL, SECRETARY  
OF CORRECTIONS; CORRECTION CARE  
SOLUTION, CARL ~~KEDIE~~, JOSEP SILVA  
(DEPARTMENT OF CORRECTIONS HEALTH  
CARE SERVICE DIRECTOR), DR. PAUL  
NOAL, DR. JAY COWAN, THE DOC'S  
HEPATITIS C COMMITTEE, SCI FRACKIVILLE'S  
MA KUREN, VISOR MS. KURAS, CHDA MS.  
HOLLY and SHARON SELBI; RN any and all  
individuals or entities responsible for  
my HEALTH CARE and/or DOC MEDICAL  
POLICIES, JANE AND JOHN DOE.  
DEFENDANTS.

CIVIL ACTION

DEMAND FOR JURY  
TRIAL

NO.

S-89-18

PROthonotary OFFICE  
JAN 19 A 11:20  
SCHUYIKILL COUNTY PA  
17901

CIVIL ACTION

TO. THE HONORABLE JUDGES OF THIS SAID COURT IN THE CAPTION.  
THE HONORABLE JUDGES:

Now cometh William D. Turner , the Plaintiff.; stated  
in the caption and presents:

JURISDICTION.

1. This is a civil action authorized by the State  
Pennsylvania Rules of Civil Procedure. Rule 1001 and other  
civil rules. Which gives this Court jurisdiction., to hear  
this ~~case~~ that seeks declaratory relief, injunction relief  
and compensation.

II. PLAINTIFF.

2. Plaintiff William D. Turner, is presently house at SCI Frackville, 1111 Altamount Blvd, Frackville PA. 17932 who at all times mention herein a prisoner of the Pennsylvania State Department of Corrections.

### III. DEFENDANTS.

3. Defendant John E. Wetzel, Secretary of Corrections is being sued once becoming aware of Turner.;' serious medical needs when grievances are filed such as on August 16, 2017; [0] which denied Plaintiff Turner, treatment for Hepatitis C, and Arthritis., that was diagnose, by medical, yet denied.; [all] because of cost. Who can be contact at 1920 Technology Parkway Mechanicsburg, PA 17050; being sued in his individual as well as official capacities, concerning policies.

4. Defendant Carl Keldie relating to Correction Care Solution who makes decisions on protocol for treatment is being sued for disregarding what was diagnose, and its cause as well as its effect without treatment, all because of cost. That can be contact at 1920 Technology Parkway, Mechanicsburg PA. 17050 being sued in his individual and official capacities.

5. Defendant Josep Silva also (CCS) Correction Care Solution that makes those proctocol decisions for treatment is being sued once disregarding what was diagnose; all because of cost. Who can be contacted at 1920 Technology Mechanicsburg, PA. 17050.;' sued in his individual and official capacities.

6. Defendant Dr Paul Noal concerning Department of Correction Health Care Service Director; is being sued by not addressing what was stated in the grievance on ongoing health

problems without treatment where Plaintiff is presently suffering from ~~arash~~ that burns with other problems. Who can be contacted at 1920 Technology Parkway, Mechanicsburg PA. 17050, sued in his individual and official capacities on pain and suffering.

7. Defendant Dr Jay Cowan another DOC HCSD, is being sued for not addressing what was filed in the grievance, also relying on cost to deny treatment disregarding pain and suffering that can be located at 1920 Technology Parkway, Mechanicsburg PA. 17050. Being sued in their individual and official capacities again concerning pain and suffering.

8. Defendant Dr MA Kuren Department of Corrections Hepatitis C Committee, SCI Frackville, is being sued because of knowing what Plaintiff Turner was going through., yet allowed cost to deny treatment as well as disregarding other medical.; needs. Who is located at SCI Frackville, 1111 Altamount Blvd., Frackville PA 17932; being sued in their individual as well as in official capacities, on pain and suffering.

9. Defendant Visor Ms. Kuras DOC HCC, of Frackville., is being sued that set in on these decisions who had knowledge relating to Plaintiff's medical needs yet let cost denied the treatment. Also located at SCI Frackville, 1111 Altamount Blvd Frackville PA 17932, being sued in her individual as well as in official capacities, on pain and suffering.

10. Defendant CHDA Ms. Holly, DOC HCC, of Frackville., is being sued that set in on these decisions when it comes to cost and denying treatment. Located at SCI Frackville, 1111 Altamount Blvd, Frackville PA 17932; being sued individual and official capacities, on pain and suffering.

11. Defendant Rn Sharon Selbi, of SCI Frackville, is being sued that also set in on these issues which was diagnose concerning Hep-C and arthritis. That is located at Frackville, 1111 Altamount Blvd, Frackville, PA 17932, being sued in their individual and official capacities, on pain and suffering.

12. Defendants John/Jane Doe., responsible for [ any] DOC's policies on treatment.

13. All Defendants have acted under th[e] color [of] State and Federal Laws during the time[s] relevant to this act /complaint.

#### IV. FACTS

14. Plaintiff Turner filed a grievance on August 16, 2017; relating to a continual refusal by the DOC Department of Corrections, to treat Plaintiff's HEPATITIS C.

15. This is causing Plaintiff Turner ongoing health problems such as: cirrhosis, concentration, memory issues also chronic fatigue, skin rash with other concerns.

16. Where no Defendant., stated in their Final decision., of December 5, 2017; there was tests taken to address [t]hose medical concerns elaborated above. Only concluded by the Bureau of Health Care Services; that medical care provided, was reasonable and appropriate.

17. Disregarding Plaintiff, present state relating to a rash which is one of the symptom told to Turner by [an]other inmate with hep-C. Where wash up cause the skin to burn, and while perspiring he also suffer, not to mention no meds., for that or arthritis.

18. And with no medical justification on why Turner.; could not receive treatment for Hep-C; when Harvoni, has a 99 percentage cure rate.

19. Where Hepatitis C, infection cause cirrhosis and irreversible scarring of the liver, proving each day with out treatment increases the likelihood of cirrhosis and death.

20. These wanton negligence, reckless and negligence acts by the Defendants from paragraph 3to11, who denied Turner treatment just because of cost relating to Hepatitis C, and arthritis; has place Plaintiff.; in harms way when it comes to the Eighth Amendment on what is diagnose.

#### V. CLAIMS

##### FIRST CAUSE OF ACTIONS

21. The actions of the Defendants stated in paragraph 14to20; concerning wanton negligence, reckless and negligence, has violated due process and equal protection of the law, also the Eighth Amendment.

- a) denied treatment for no medical reasons and
- b) just because of cost on what has been diagnose

##### SECOND CAUSE OF ACTIONS

22. The wanton negligence, reckless, negligence, and disregard for the Eighth Amendment by the Defendants state[d] in this complaint at paragraph 14to20., has place Plaintiff.; in harms way of pain, suffering, cirrhosis and death..

- a) denied treatment contrary to the law and
- b) overlooking Turner's suffering.



23. The actions of the Defendants stated in paragraph 3 through 20 violated Federal and State Law.

#### VI. RELIEF

WHEREFORE, Plaintiff Turner request this Honorable Court., to grant the following relief:

A. Issue a declaratory judgment that the Defendants.; violated the United States Constitution and State Law when they :

- 1) denied treatment for hep-C without no medical justification only cost
- 2) disregard what was diagnose
- 3) not testing for cirrhosis
- 4) follow the Law concerning treatment for Hepatitis C

B. Issue an injunction ordering that Defendants, or their agents.

- 1) refrain from denying treatment for Hep-C
- 2) refrain from disregarding what was diagnose
- 3) refrain from not treating arthritis
- 4) refrain from not following the law relating to treatment of hepatitis C

C. Grant compensatory damages in the following amount:

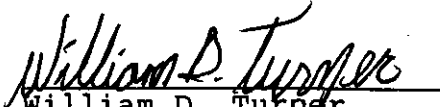
- 1) 10.000 or more against Defendant Wetzel
- 2) 10.000 or more against Defendant Silva
- 3) 10.000 or more against Defendant Keldie
- 4) 10.000 or more against Defendant Noal
- 5) 10.000 or more against Defendant Cowan
- 6) 10.000 or more against Defendant Kuren
- 7) 10.000 or more against Defendant Kuras
- 8) 10.000 or more against Defendant Holly
- 9) 10.000 or more against Defendant Selbi
- 10) 10.000 or more against John/Jane Doe

D. Grant punitive damage of 100.000 against each of the Defendants.

E. Grant such other relief as it may appear Plaintiff is entitled.

VII. CONCLUSION

Respectfully submitted

  
\_\_\_\_\_  
William D. Turner  
AM 5992  
1111 Altamount Blvd  
Frackville, PA 17932

Date. 1.17.18

IN THE COMMON PLEAS COURT OF PENNSYLVANIA  
COUNTY OF SCHUYIKILL

(2)

WILLIAM D. TURNER,  
PLAINTIFF.

VS.

JOHN E. WETZEL, ET AL.  
DEFENDANTS.

:

:

:

:

:

CERTIFICATE OF MERIT

CIVIL ACTION

NO.

S-8

SCHUYIKILL COUNTY PA

2018 JAN 23 A 9 42

PROTHONOTARY OFFICE

CERTIFICATE OF MERIT

I, William D. Turner, filed this certificate of merit concerning the complaint on which to diagnose, where the Defendants deviated from an acceptable professional standard by disregarding care and the law on such.<sup>1</sup>

Respectfully submitted

William D. Turner  
William D. Turner AM5992  
Pro-se  
SCI Frackville  
1111 Altamount Blvd  
Frackville, PA 17932

Date. 1.18.18.

1. warranting no other opinion.

VERIFICATION

I, verify that I'am the Plaintiff as designated in the civil action and that the facts and statement contained in this Complaint and Certificate of Merit are true as well as correct to the best of Plaintiff knowledge. Also understand by and that any false statements are made is subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

(s) William D. Turner  
William D. Turner  
AM 5992  
1111 Altamount Blvd  
Frackville, PA 17932

Date. 1.18.18.

Mon Mar 12, 2018 02:52PM

PAGE: 1

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* A F F I D A V I T O F R E T U R N \* \*

PLAINTIFF: TURNER, WILLIAM D  
V S  
DEFENDANT: WETZEL, JOHN E ET AL  
ATTORNEY: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

COURT NUMBER : S-89-2018  
FILED BY :  
TYPE OF PAPER : CIVIL ACTION  
SERVING NUMBER : 91234  
PRO FILE DATE : 01/26/2018  
EXPIRATION : 02/25/2018  
SHF RECEIVED : 01/26/2018  
DEP RETURNED : 02/01/2018

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
Service for	WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	SILVA, JOSEF	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
	KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	02/05/2018	11:33	DEB BRYAN	1920 TECHNOLOGY PARK		MECHANICSBURG	PA			0.00
* REMARKS : SERVICE MADE BY DEPUTY FROM OUT OF COUNTY										

Total : 0.00

Total Fee Charge for all Services : 0.00

Mon Mar 12, 2018 02:52PM

PAGE: 2

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

DEB BRYAN (CLERICAL SUPERVISOR)  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG PA

ON  
02/05/2018  
at 11:33

SWORN and subscribed before me this 19

day of

March 2018  
[Signature]  
(Prothonotary)

SO ANSWERS

John F. Hayes

(Deputy Sheriff)

Joseph S. Grady  
(Sheriff of Schuylkill County)

End - of - Return (S-89-2018)

Mon Mar 12, 2018 02:52PM

PAGE: 3

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* A F F I D A V I T O F R E T U R N \* \*

PLAINTIFF: TURNER, WILLIAM D	COURT NUMBER : S-89-2018
V S	FILED BY :
DEFENDANT: WETZEL, JOHN E ET AL	TYPE OF PAPER : CIVIL ACTION
ATTORNEY: _____	SERVING NUMBER : 91234
_____	PRO FILE DATE : 01/26/2018
_____	EXPIRATION : 02/25/2018
_____	SHF RECEIVED : 01/26/2018
_____	DEP RETURNED : 02/01/2018

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
Service for	WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	SILVA, JOSEP	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
	KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	02/05/2018	11:33	DIANE HINKLE	1920 TECHNOLOGY PARK		MECHANICSBURG	PA			0.00
* REMARKS : SERVICE MADE BY DEPUTY FROM OUT OF COUNTY										

Total : 0.00

Total Fee Charge for all Services : 0.00

Mon Mar 12, 2018 02:52PM

PAGE: 4

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

DIANE HINKLE (OFFICE MANAGER)  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG PA

ON  
02/05/2018  
at 11:33

SWORN and subscribed before me this 19

day of

March, 2018

(Prothonotary)

SO ANSWERS

John F. Hayes

(Deputy Sheriff)

Joseph S. Grady

(Sheriff of Schuylkill County)

End - of - Return (S-89-2018)



Mon Mar 12, 2018 02:52PM

PAGE: 5

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* A F F I D A V I T O F R E T U R N \* \*

PLAINTIFF: TURNER, WILLIAM D	COURT NUMBER : S-89-2018
V S	FILED BY :
DEFENDANT: WETZEL, JOHN E ET AL	TYPE OF PAPER : CIVIL ACTION
ATTORNEY: _____	SERVING NUMBER : 91234
_____	PRO FILE DATE : 01/26/2018
_____	EXPIRATION : 02/25/2018
_____	SHF RECEIVED : 01/26/2018
_____	DEP RETURNED : 02/01/2018

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
Service for	WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	SILVA, JOSEP	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
	KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	02/05/2018	11:33	DEB BRYAN	1920 TECHNOLOGY PARK		MECHANICSBURG	PA			0.00
* REMARKS : SERVICE MADE BY DEPUTY FROM OUT OF COUNTY										

Total : 0.00

Total Fee Charge for all Services : 0.00

Mon Mar 12, 2018 02:52PM

PAGE: 6

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

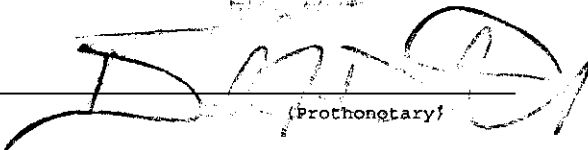
I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

DEB BRYAN (CLERICAL SUPERVISOR)  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG PA.

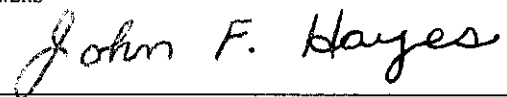
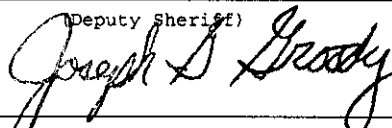
ON  
02/05/2018  
at 11:33

SWORN and subscribed before me this 19

day of March 2018

  
(Prothonotary)

SO ANSWERS

  
  
(Deputy Sheriff)  
(Sheriff of Schuylkill County)

End - of - Return (S-89-2018)

Mon Mar 12, 2018 02:52PM

PAGE: 7

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* A F F I D A V I T O F R E T U R N \* \*

PLAINTIFF:	TURNER, WILLIAM D	COURT NUMBER :	S-89-2018
	V S	FILED BY :	
DEFENDANT:	WETZEL, JOHN E ET AL	TYPE OF PAPER :	CIVIL ACTION
		SERVING NUMBER :	91234
ATTORNEY:	_____	PRO FILE DATE :	01/26/2018
	_____	EXPIRATION :	02/25/2018
	_____	SHF RECEIVED :	01/26/2018
	_____	DEP RETURNED :	02/01/2018

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
Service for	WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	SILVA, JOSEP	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
	KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	02/05/2018	11:33	DEB BRYAN	1920 TECHNOLOGY PARK		MECHANICSBURG	PA			0.00
* REMARKS : SERVICE MADE BY DEPUTY FROM OUT OF COUNTY										

Total : 0.00

Total Fee Charge for all Services : 0.00

Mon Mar 12, 2018 02:52PM

PAGE: 8

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

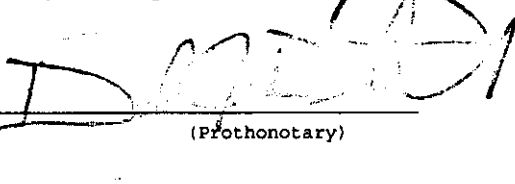
DEB BRYAN (CLERICAL SUPERVISOR)  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG PA

ON  
02/05/2018  
at 11:33

SWORN and subscribed before me this 19

day of

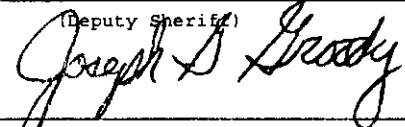
March 2018

  
(Prothonotary)

SO ANSWERS

John F. Hayes

(Deputy Sheriff)



(Sheriff of Schuylkill County)

End - of - Return (S-89-2018)

Mon Mar 12, 2018 02:52PM

PAGE: 9

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* A F F I D A V I T O F R E T U R N \* \*

PLAINTIFF:	TURNER, WILLIAM D	COURT NUMBER :	S-89-2018
	V S	FILED BY :	
DEFENDANT:	WETZEL, JOHN E ET AL	TYPE OF PAPER :	CIVIL ACTION
		SERVING NUMBER :	91234
ATTORNEY:		PRO FILE DATE :	01/26/2018
		EXPIRATION :	02/25/2018
		SHF RECEIVED :	01/26/2018
		DEP RETURNED :	02/01/2018

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
	WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	SILVA, JOSEP	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
Service for	COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
	KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	02/05/2018	11:33	DEB BRYAN	1920 TECHNOLOGY PARK		MECHANICSBURG	PA			0.00
* REMARKS : SERVICE MADE BY DEPUTY FROM OUT OF COUNTY										

Total : 0.00

Total Fee Charge for all Services : 0.00

Mon Mar 12, 2018 02:52PM

PAGE: 10

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

DEB BRYAN (CLERICAL SUPERVISOR)  
1920 TECHNOLOGY PARKWAY  
MECHANICSBURG PA

ON  
02/05/2018  
at 11:33

SWORN and subscribed before me this 19

day of

March 2018

[Signature]  
(Prothonotary)

SO ANSWERS

John F. Hayes  
(Deputy Sheriff)  
Joseph S. Grady  
(Sheriff of Schuylkill County)

End - of - Return (S-89-2018)

## SHERIFF'S OFFICE OF CUMBERLAND COUNTY

Ronny R Anderson  
Sheriff

Jody S Smith  
Chief Deputy

Richard W Stewart  
Solicitor



SCHUYLKILL COUNTY  
PENNSYLVANIA  
2018 FEB 26 AM 5:53  
RECEIVED  
SHERIFF'S OFFICE  
Case Number  
S-89-2018

William D. Turner  
vs.  
John E. Wetzel (et al.)

### SHERIFF'S RETURN OF SERVICE

02/05/2018 11:33 AM - Corporal Dennis Fry, being duly sworn according to law, served the requested Complaint & Notice by handing a true copy to a person representing themselves to be Deb Bryan, clerical supervisor, who accepted as "Adult Person in Charge" for John E. Wetzel at PA Department of Corrections, 1920 Technology Parkway, Hampden Township, Mechanicsburg, PA 17050.

  
DENNIS FRY, CORPORAL

02/05/2018 11:33 AM - Corporal Dennis Fry, being duly sworn according to law, served the requested Complaint & Notice by handing a true copy to a person representing themselves to be Deb Bryan, clerical supervisor, who accepted as "Adult Person in Charge" for Joseph Silva at Correction Care Solution, 1920 Technology Parkway, Hampden Township, Mechanicsburg, PA 17050.

  
DENNIS FRY, CORPORAL

02/05/2018 11:33 AM - Corporal Dennis Fry, being duly sworn according to law, served the requested Complaint & Notice by handing a true copy to a person representing themselves to be Deb Bryan, clerical supervisor, who accepted as "Adult Person in Charge" for Paul Noal at Dept of Correction Health Care, 1920 Technology Parkway, Hampden Township, Mechanicsburg, PA 17050.

  
DENNIS FRY, CORPORAL

02/05/2018 12:55 PM - Corporal Dennis Fry, being duly sworn according to law, served the requested Complaint & Notice by handing a true copy to a person representing themselves to be Diane Hinkle, Office manager, who accepted as "Adult Person in Charge" for Jay Cowan at 600 N 12th St, Lemoyne Borough, Lemoyne, PA 17043.


  
DENNIS FRY, CORPORAL

02/05/2018 12:55 PM - Corporal Dennis Fry, being duly sworn according to law, served the requested Complaint & Notice by handing a true copy to a person representing themselves to be Diane Hinkle, Office manager, who accepted as "Adult Person in Charge" for Carl Keldie at 600 N 12th St, Lemoyne Borough, Lemoyne, PA 17043.

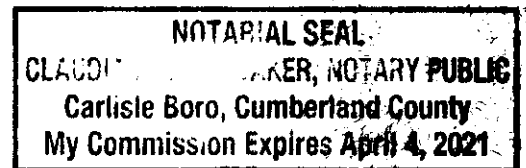
  
DENNIS FRY, CORPORAL

SHERIFF COST: \$0.00

SO ANSWERS,

  
\_\_\_\_\_  
RONNY R ANDERSON, SHERIFF

February 08, 2018



NOTARY

Affirmed and subscribed to before me this

22<sup>nd</sup> day of February, 2018

  
\_\_\_\_\_  
Claudine Baker



## SCHUYLKILL COUNTY SHERIFF'S DEPARTMENT

SHERIFF SERVICE  
PROCESS RECEIPT AND AFFIDAVIT OF RETURN

EXPIRATION DATE: 02/25/2018

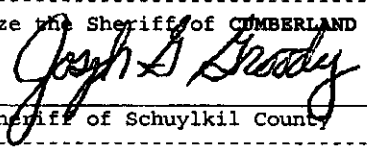
TYPE OF SERVICE  
CIVIL ACTIONSERVICE ID  
91234COURT NUMBER  
S-89-2018PLAINTIFFS  
WILLIAM D TURNERDEFENDANTS  
JOHN E WETZEL  
CARL KELDIE, et al

## PERSON TO SERVE

---> JOSEP SILVA

CORRECTION CARE SOLUTION 1920 TECHNOLOGY PARKWAY MECHANICSBURG PA 17050

Now, January 26, 2018, I, SHERIFF OF SCHUYLKILL COUNTY, PA do hereby deputize the Sheriff of ~~SCHUYLKILL~~ CUMBERLAND County, to execute this Writ and make return thereof according to the law. This deputation being made at the request of the Plaintiff.

  
 Sheriff of Schuylkil County
SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN  
EXPEDITING SERVICE: \*\* SEND RETURN TO SCHUYLKILL SHERIFF \*\*NOTE ONLY APPLICABLE ON WRIT OF EXECUTION:  
N.B. WAIVER OF WATCHMEN:

Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

ATTORNEY INFORMATION  
COUNTY CHARGE

## SHERIFF'S SERVICE AND RETURN

Served and made known to \_\_\_\_\_ Defendant(s)  
on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM,  
at \_\_\_\_\_ County of \_\_\_\_\_

Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant(s) personally served  
☐ Adult family member with whom said Defendant(s) reside(s). Relationship is \_\_\_\_\_  
☐ Adult in charge of Defendant's Residence.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business  
☐ Other \_\_\_\_\_

On the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM.

Defendant not found because:

☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant ☐ Other \_\_\_\_\_

Remarks:

Returned:

Affirmed and subscribed to before me this \_\_\_\_\_  
day of \_\_\_\_\_, \_\_\_\_\_

Notary Public

MY COMMISSION EXPIRES: \_\_\_\_\_

SO ANSWERS,  
Signature of Deputy Sheriff Date

Signature of Sheriff Date

RECEIVED  
SHERIFF'S OFFICE  
2018 FEB 26 AM 11:53  
SCHUYLKILL COUNTY  
PENNSYLVANIA

## SCHUYLKILL COUNTY SHERIFF'S DEPARTMENT

SHERIFF SERVICE  
PROCESS RECEIPT AND AFFIDAVIT OF RETURN

EXPIRATION DATE: 02/25/2018

TYPE OF SERVICE  
CIVIL ACTIONSERVICE ID  
91234COURT NUMBER  
S-89-2018PLAINTIFFS  
WILLIAM D TURNERDEFENDANTS  
JOHN E WETZEL  
CARL KELDIE, et al

## PERSON TO SERVE

---> CARL KELDIE

CORRECTION CARE SOLUTION 1920 TECHNOLOGY PARKWAY MECHANICSBURG PA 17050

Now, January 26, 2018, I, SHERIFF OF SCHUYLKILL COUNTY, PA do hereby deputize the Sheriff of CUMBERLAND County, to execute this Writ and make return thereof according to the law. This deputation being made at the request of the Plaintiff.

  
 Sheriff of Schuylkil County
SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN  
EXPEDITING SERVICE: \*\* SEND RETURN TO SCHUYLKILL SHERIFF \*\*NOTE ONLY APPLICABLE ON WRIT OF EXECUTION:  
N.B. WAIVER OF WATCHMEN:

Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

ATTORNEY INFORMATION  
COUNTY CHARGE

## SHERIFF'S SERVICE AND RETURN

Served and made known to \_\_\_\_\_, Defendant(s)

on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM,

at \_\_\_\_\_ County of \_\_\_\_\_

Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant(s) personally served  
☐ Adult family member with whom said Defendant(s) reside(s). Relationship is \_\_\_\_\_  
☐ Adult in charge of Defendant's Residence.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business  
☐ Other \_\_\_\_\_

On the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM.

Defendant not found because:

☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant ☐ Other \_\_\_\_\_

Remarks:

Returned:

 Affirmed and subscribed to before me this \_\_\_\_\_  
 day of \_\_\_\_\_, \_\_\_\_\_

Notary Public

MY COMMISSION EXPIRES: \_\_\_\_\_

 SO ANSWERS,  
 Signature of Deputy Sheriff \_\_\_\_\_ Date \_\_\_\_\_

Signature of Sheriff \_\_\_\_\_ Date \_\_\_\_\_

 RECEIVED  
 SHERIFF'S OFFICE  
 2018 FEB 26 A 11:53  
 SCHUYLKILL COUNTY  
 PENNSYLVANIA

## SCHUYLKILL COUNTY SHERIFF'S DEPARTMENT

SHERIFF SERVICE  
PROCESS RECEIPT AND AFFIDAVIT OF RETURN

EXPIRATION DATE: 02/25/2018

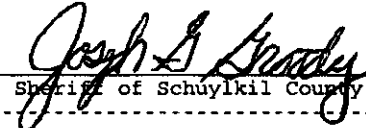
TYPE OF SERVICE  
CIVIL ACTIONSERVICE ID  
91234COURT NUMBER  
S-89-2018PLAINTIFFS  
WILLIAM D TURNERDEFENDANTS  
JOHN E WETZEL  
CARL KELDIE, et al

## PERSON TO SERVE

----> JOHN E WETZEL

SECRETARY OF CORRECTIONS 1920 TECHNOLOGY PARKWAY MECHANICSBURG PA 17050

Now, January 26, 2018, I, SHERIFF OF SCHUYLKILL COUNTY, PA do hereby deputize the Sheriff of CUMBERLAND County, to execute this Writ and make return thereof according to the law. This deputation being made at the request of the Plaintiff.

  
 Sheriff of Schuylkil County

 SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN  
 EXPEDITING SERVICE: \*\* SEND RETURN TO SCHUYLKILL SHERIFF \*\*

## NOTE ONLY APPLICABLE ON WRIT OF EXECUTION:

## N.B. WAIVER OF WATCHMEN:

Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

 ATTORNEY INFORMATION  
 COUNTY CHARGE

## SHERIFF'S SERVICE AND RETURN

Served and made known to \_\_\_\_\_, Defendant(s)  
 on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM,  
 at \_\_\_\_\_ County of \_\_\_\_\_

Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant(s) personally served  
☐ Adult family member with whom said Defendant(s) reside(s). Relationship is \_\_\_\_\_  
☐ Adult in charge of Defendant's Residence.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business  
☐ Other \_\_\_\_\_

On the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM.

Defendant not found because:

☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant ☐ Other \_\_\_\_\_

Remarks:

Returned:

Affirmed and subscribed to before me this \_\_\_\_\_  
 day of \_\_\_\_\_,

SO ANSWERS,  
 Signature of Deputy Sheriff Date

Signature of Sheriff Date

Notary Public

MY COMMISSION EXPIRES: \_\_\_\_\_

RECEIVED  
 SHERIFF'S OFFICE  
 2018 FEB 26 4 11:53  
 SCHUYLKILL COUNTY  
 PENNSYLVANIA

## SCHUYLKILL COUNTY SHERIFF'S DEPARTMENT

SHERIFF SERVICE  
PROCESS RECEIPT AND AFFIDAVIT OF RETURN

EXPIRATION DATE: 02/25/2018

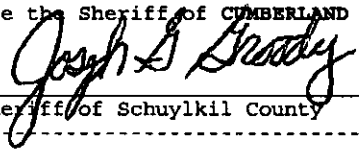
TYPE OF SERVICE  
CIVIL ACTIONSERVICE ID  
91234COURT NUMBER  
S-89-2018PLAINTIFFS  
WILLIAM D TURNERDEFENDANTS  
JOHN E WETZEL  
CARL KELDIE, et al

## PERSON TO SERVE

---> DR. PAUL NOAL

DEPT OF CORRECTION HEALTH CARE 1920 TECHNOLOGY PARKWAY MECHANICSBURG PA 17050

Now, January 26, 2018, I, SHERIFF OF SCHUYLKILL COUNTY, PA do hereby deputize the Sheriff of ~~CUMBERLAND~~ County, to execute this Writ and make return thereof according to the law. This deputation being made at the request of the Plaintiff.

  
 Sheriff of Schuylkil County
SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN  
EXPEDITING SERVICE: \*\* SEND RETURN TO SCHUYLKILL SHERIFF \*\*

## NOTE ONLY APPLICABLE ON WRIT OF EXECUTION:

## N.B. WAIVER OF WATCHMEN:

Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

ATTORNEY INFORMATION  
COUNTY CHARGE

## SHERIFF'S SERVICE AND RETURN

Served and made known to \_\_\_\_\_, Defendant(s)  
on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM,  
at \_\_\_\_\_ County of \_\_\_\_\_

Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant(s) personally served  
☐ Adult family member with whom said Defendant(s) reside(s). Relationship is  
☐ Adult in charge of Defendant's Residence.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business  
☐ Other \_\_\_\_\_

On the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM.

Defendant not found because:

☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant ☐ Other \_\_\_\_\_

Remarks:

Returned:

Affirmed and subscribed to before me this \_\_\_\_\_  
day of \_\_\_\_\_, \_\_\_\_\_

Notary Public

MY COMMISSION EXPIRES: \_\_\_\_\_

SO ANSWERS,  
Signature of Deputy Sheriff Date

Signature of Sheriff Date

RECEIVED  
 SHERIFF'S OFFICE  
 2018 FEB 26 A 11:53  
 SCHUYLKILL COUNTY  
 PENNSYLVANIA

## SCHUYLKILL COUNTY SHERIFF'S DEPARTMENT

SHERIFF SERVICE  
PROCESS RECEIPT AND AFFIDAVIT OF RETURN

EXPIRATION DATE: 02/25/2018

TYPE OF SERVICE  
CIVIL ACTION

SERVICE ID  
91234

COURT NUMBER  
S-89-2018

PLAINTIFFS  
WILLIAM D TURNER

DEFENDANTS  
JOHN E WETZEL  
CARL KELDIE, et al

PERSON TO SERVE  
----> DR. JAY COWAN  
1920 TECHNOLOGY PARKWAY MECHANICSBURG PA 17050

Now, January 26, 2018, I, SHERIFF OF SCHUYLKILL COUNTY, PA do hereby deputize the Sheriff of CUMBERLAND County, to execute this Writ and make return thereof according to the law. This deputation being made at the request of the Plaintiff.

*Joseph A. Brady*  
Sheriff of Schuylkil County

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN  
EXPEDITING SERVICE: \*\* SEND RETURN TO SCHUYLKILL SHERIFF \*\*

NOTE ONLY APPLICABLE ON WRIT OF EXECUTION:  
N.B. WAIVER OF WATCHMEN:  
Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

ATTORNEY INFORMATION  
COUNTY CHARGE

## SHERIFF'S SERVICE AND RETURN

Served and made known to \_\_\_\_\_, Defendant(s)  
on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM,  
at \_\_\_\_\_ County of \_\_\_\_\_

Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant(s) personally served  
☐ Adult family member with whom said Defendant(s) reside(s). Relationship is \_\_\_\_\_  
☐ Adult in charge of Defendant's Residence.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business  
☐ Other \_\_\_\_\_

On the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock, AM/PM.

Defendant not found because:

☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant ☐ Other \_\_\_\_\_

Remarks:

Returned:

Affirmed and subscribed to before me this \_\_\_\_\_  
day of \_\_\_\_\_, \_\_\_\_\_

Notary Public

MY COMMISSION EXPIRES: \_\_\_\_\_

SO ANSWERS,  
Signature of Deputy Sheriff Date

Signature of Sheriff Date

RECEIVED  
SHERIFF'S OFFICE  
2018 FEB 26 A 11:53  
SCHUYLKILL COUNTY  
PENNSYLVANIA

Wed Jan 31, 2018 01:36PM

PAGE: 11

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570



## \* \* A F F I D A V I T O F R E T U R N \* \*

PLAINTIFF: TURNER, WILLIAM D COURT NUMBER : S-89-2018  
V S FILED BY :  
DEFENDANT: WETZEL, JOHN E ET AL TYPE OF PAPER : CIVIL ACTION  
SERVING NUMBER : 91234  
ATTORNEY: \_\_\_\_\_ PRO FILE DATE : 01/26/2018  
| \_\_\_\_\_ EXPIRATION : 02/25/2018  
| \_\_\_\_\_ SHF RECEIVED : 01/26/2018  
| \_\_\_\_\_ DEP RETURNED : 02/01/2018  
| \_\_\_\_\_

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
	WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	SILVA, JOSEP	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
Service for	KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	01/30/2018	08:03	JEN NEWBERRY	1111 ALTAMONT BLVD		FRACKVILLE	PA	17931	40	21.80
* REMARKS : SERVICE MADE BY DEPUTY MORGAN, J										

Total : 21.80

Total Fee Charge for all Services : 21.80

Wed Jan 31, 2018 01:36PM

PAGE: 12

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

JEN NEWBERRY {}  
1111 ALTAMONT BLVD  
FRACKVILLE PA

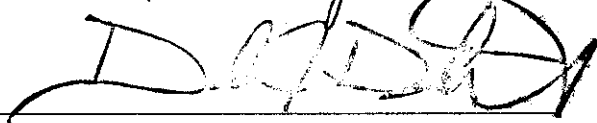
ON  
01/30/2018  
at 08:03

SWORN and subscribed before me this 5

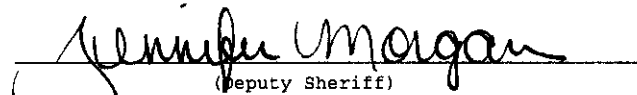
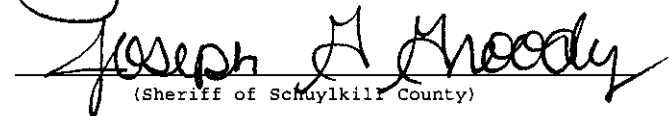
SO ANSWERS

day of

February 2018



(Prothonotary)

  
(Deputy Sheriff)  
(Sheriff of Schuylkill County)

End - of - Return (S-89-2018)

Wed Jan 31, 2018 01:36PM

PAGE: 13

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* A F F I D A V I T O F R E T U R N \* \*

PLAINTIFF:	TURNER, WILLIAM D	COURT NUMBER :	S-89-2018
	V S	FILED BY :	
DEFENDANT:	WETZEL, JOHN E ET AL	TYPE OF PAPER :	CIVIL ACTION
		SERVING NUMBER :	91234
ATTORNEY:	_____	PRO FILE DATE :	01/26/2018
	_____	EXPIRATION :	02/25/2018
	_____	SHF RECEIVED :	01/26/2018
	_____	DEP RETURNED :	02/01/2018

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
	WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	SILVA, JOSEP	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
	KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
Service for	KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	01/30/2018	08:03	JEN NEWBERRY	1111 ALTAMONT BLVD		FRACKVILLE	PA	17931		0.00
	* REMARKS : SERVICE MADE BY DEPUTY MORGAN, J									

Total : 0.00

Total Fee Charge for all Services : 21.80



Wed Jan 31, 2018 01:36PM

PAGE: 14

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

JEN NEWBERRY (PERSON IN CHARGE)  
1111 ALTAMONT BLVD  
FRACKVILLE PA

ON  
01/30/2018  
at 08:03

SWORN and subscribed before me this 5

SO ANSWERS

day of February 2018

Jennifer Morgan  
(Deputy Sheriff)

[Signature]  
(Prothonotary)

Joseph A. Shaddy  
(Sheriff of Schuylkill County)

End - of - Return (S-89-2018)

Wed Jan 31, 2018 01:36PM

PAGE: 15

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* A F F I D A V I T O F R E T U R N \* \*

PLAINTIFF:	TURNER, WILLIAM D	COURT NUMBER :	S-89-2018
	V S	FILED BY :	
DEFENDANT:	WETZEL, JOHN E ET AL	TYPE OF PAPER :	CIVIL ACTION
		SERVING NUMBER :	91234
ATTORNEY:	_____	PRO FILE DATE :	01/26/2018
	_____	EXPIRATION :	02/25/2018
	_____	SHF RECEIVED :	01/26/2018
	_____	DEP RETURNED :	02/01/2018

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
	WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	SILVA, JOSEP	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
	KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
Service for	CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	01/30/2018	08:03	JEN NEWBERRY	1111 ALTAMONT BLVD		FRACKVILLE	PA	17931		0.00
	* REMARKS : SERVICE MADE BY DEPUTY MORGAN, J									

Total : 0.00

Total Fee Charge for all Services : 21.80

Wed Jan 31, 2018 01:36PM

PAGE: 16

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

JEN NEWBERRY ()  
1111 ALTAMONT BLVD  
FRACKVILLE PA

ON  
01/30/2018  
at 08:03

SWORN and subscribed before me this 5

SO ANSWERS

day of February, 2018

Jennifer Morgan  
(Deputy Sheriff)  
Joseph A. Knodly  
(Sheriff of Schuylkill County)

[Signature]  
(Prothonotary)

End - of - Return (S-89-2018)

Wed Jan 31, 2018 01:36PM

PAGE: 17

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* A F F I D A V I T O F R E T U R N \* \*

PLAINTIFF:	TURNER, WILLIAM D	COURT NUMBER :	S-89-2018
	V S	FILED BY :	
DEFENDANT:	WETZEL, JOHN E ET AL	TYPE OF PAPER :	CIVIL ACTION
		SERVING NUMBER :	91234
ATTORNEY:	_____	PRO FILE DATE :	01/26/2018
	_____	EXPIRATION :	02/25/2018
	_____	SHF RECEIVED :	01/26/2018
	_____	DEP RETURNED :	02/01/2018

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
	WETZEL, JOHN E	SECRETARY OF CORRECT	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	KELDIE, CARL	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	SILVA, JOSEP	CORRECTION CARE SOLU	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	NOAL, PAUL DR.	DEPT OF CORRECTION H	1920 TECHNOLOGY PARK	MECHANICSBURG	PA	17050	COUNTY, O
	COWAN, JAY DR.	1920 TECHNOLOGY PARK		MECHANICSBURG	PA	17050	COUNTY, O
	KUREN, MA DR.	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	KURAS, VISOR	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
	CHDA, HOLLY	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J
Service for	SELBI RN, SHARON	SCI FRACKVILLE	1111 ALTAMONT BLVD	FRACKVILLE	PA	17932	MORGAN, J

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	FEE	COST
1	01/30/2018	08:03	JEN NEWBERRY	1111 ALTAMONT BLVD		FRACKVILLE	PA	17931		0.00
	* REMARKS : SERVICE MADE BY DEPUTY MORGAN, J									

Total : 0.00

Total Fee Charge for all Services : 21.80

Wed Jan 31, 2018 01:36PM

PAGE: 18

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

I hereby CERTIFY and RETURN that service was made by handing a TRUE and ATTESTED COPY to :

JEN NEWBERRY ()  
1111 ALTAMONT BLVD  
FRACKVILLE PA

ON  
01/30/2018  
at 08:03

SWORN and subscribed before me this 5

SO ANSWERS

day of February 2018

Jennifer Morgan  
(Deputy Sheriff)  
Joseph H. Moody  
(Sheriff of Schuylkill County)

End - of - Return (S-89-2018)

Wed Jan 31, 2018 01:36PM

PAGE: 19

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

## S E R V I C E R E T U R N C O M M E N T S

## 1. IN FORMA PAUPERIS FILED

## C O S T S I N F O R M A T I O N

DESCRIPTION	PAYMENTS	CHARGES	BALANCE
R D & R		9.00	-9.00
SERVICE		9.00	-18.00
ATTESTING		36.00	-54.00
SERVICE FEE		21.80	-75.80

Cost of Service : 75.80

County Charge : 75.80

## C O U N T Y C H A R G E

-----  
End - of - Return (S-89-2018)

COUNTY CHARGE  
OFFICE OF THE SHERIFF  
OF SCHUYLKILL COUNTY

DATE : 02/01/2018

Case Ref : S-89-2018

Service ID: 91234

Type : CIVIL ACTION

Defendant: JOHN E WETZEL

Address 1 : SECRETARY OF CORRECTIONS

Address 2 : 1920 TECHNOLOGY PARKWAY

City : MECHANICSBURG

Cost of Service : 75.80

County Charge : 75.80

COURT OF COMMON PLEAS OF SCHUYLKILL COUNTY--CIVIL ACTION-LAW

WILLIAM D. TURNER,  
Plaintiff

: No. S-89-18  
:  
:  
:  
:  
:  
:  
:

vs.

JOHN E. WETZEL, et al.,  
Defendants

SCHUYLKILL COUNTY  
CLERK OF COURT  
2018 JAN 26 P 1:30  
CLERK'S OFFICE

ORDER OF COURT

RUSSELL, J.

AND NOW, this 26<sup>th</sup> day of January, 2018, it is hereby ORDERED Plaintiff may proceed in forma pauperis and proceed without payment of costs as provided by law. However, he shall inform the Court of any change in his financial condition.

BY THE COURT,

Russell J.

NOTHOMOTARY OFFICE  
2018 JAN 26 P 1:30  
SCHUYLKILL COUNTY PA  
17901



After Five Days Return to

PETER J. SYMONS, JR.

PROTHONOTARY OF SHERBURN COUNTY

401 N 2ND ST

POFFSVILLE PA 17901-2520

SCRANTON

APR 08 2018

PER  DEPUTY CLERK

RECEIVED  
APR 11 2018

PER

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS FOLD AT DOTTED LINE

CERTIFIED MAIL



7017 1450 0001 1524 3917

US DISTRICT COURT  
MIDDLE DISTRICT OF PA  
PO BOX 1148  
SCRANTON, PA 18501